

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	ZS405564007	Site name	RODONAS SA
Business name	RODONAS SA	Site address	TOUMPA KILKIS EL 61400

Audit details

Sedex company reference	ZC405462583	Auditor company name	EUROPEAN INSPECTION AND CERTIFICATION COMPANY(EUROCERT) SA
Audit company address	89 Chlois & Likovriseos Str., Metamorfosi, ATHENS, EL, 144 52		
Date of audit	2026-08-19	Audit conducted by	Avgi Topouzidou
Audit pillars	Labour Standards Health and safety		
Time in and out	Day 1 In08:30 Out16:30		
Audit type	Periodic		
Was the audit announced?	Announced		

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Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Nikoleta Kani / Quality Manager / System Responsible

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 Union in place at the company.		
Reason for absence during the audit	There is no Union in place at the company.		
Reason for absence at the closing meeting	There is no Union in place at the company.		

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)

N/A

Lead auditor

Avgi Topouzidou

APSCA Number

32200504

Additional auditor

Date of declaration

2026-08-19

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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	Nikoleta Kani
Title	Quality Manager / System Responsible
Date of declaration	2026-08-19

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.G Provide sufficient first-aid supplies ons...	Local law	NC ZAF601573157
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601573158

Management systems

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



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

[← Summary of findings](#)

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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				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC405462583	
Sedex site reference	ZS405564007	
Company name	RODONAS SA	
Business ownership type	GOODS	
Site name	RODONAS SA	
Site name in local language	ΡΟΔΩΝΑΣ Α.Ε.	
GPS location	GPS address	TOUMPA KILKIS
	Coordinates	Longitude: 22.52147, Latitude: 40.94967
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	NIKOLETA KANI
	Job title	Quality Manager
	Phone number	00302343071210
	Email	info@rodonas.gr
Applicable business and other legally required business license numbers and documents	- Operation permit No. 1222663 (ver. 1)/07-03-2023 - Environmental permit (Standard Environmental Commitments), Prot. No. 695978(3056)/2-11-2021	

[← Management systems](#)
[Worker analysis →](#)

Site activities

Site function	Factory Processing/Manufacturer Pack house	
Site activities	Primary	Processing and preserving of fruit and vegetables
	Secondary	
	Other	
Product type	Pomegranates in carton boxes and pomegranate arils (sealed packaged). Pateurized pomegranate juice in PET bottles.	
Process overview	The factory consists of a sorting, packaging fruit conservation unit, and a unit for the production and standardization of pomegranate juice. Upon receipt of the pomegranates, a quantitative and qualitative inspection is carried out and the fruit is stored in cold rooms. In production, defective fruits are removed and the pomegranates are manually opened. A machine separates the arils from the peel, followed by thorough washing with running water. The arils go through sorting by trained staff and excess moisture is removed. Once ready, they are weighed, packaged in modified atmosphere containers, labeled with expiration dates and necessary information and pass through a metal detector. Finally, the packaged arils are stored in cold rooms until loading onto the re Fridgerated vehicle. There are two sorting lines, one production line and one packaging line. The main equipment includes: 5 cooling chambers, 1 arils extracting machine, 1 weighing & packaging assembly machine, 1 metal detector, 2 forklifts.	
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
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[Worker analysis →](#)

Site scope

What is the area of audited site to its boundary?	65220m ²	
Building 1	Last construction works on site	2017
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Sorting, packaging, fruit conservation. Production and standardization of pomegranate juice. Administrative offices. WC, kitchen, lockers.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No	
Does the site organise worker transport to the worksite?	Not provided	The workers organise their transport to the worksite themselves.

[← Site details](#)

[Worker analysis →](#)

Work patterns

Approximate workers on site per month (% of peak)	January	90-100%	February	90-100%
	March	90-100%	April	60-80%
	May	40-60%	June	40-60%
	July	20-40%	August	20-40%
	September	40-60%	October	90-100%
	November	90-100%	December	90-100%

Is there any night shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? Other certification, Other social audit
GRASP, cert. no. 20.01.0628.02, issued by Eurocert, valid until 24/10/2026
GLOBALG.A.P., cert. no. 20.01.0628.02, issued by Eurocert, valid until 24/10/2026
IFS, cert. no. 00.07.0160/IFS, issued by Eurocert, valid until 30/01/2027

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? No
There has been no assessment for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
There has never been a Human Rights Impact Assessment conducted at this site.

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[Worker analysis →](#)

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	2 (13.3%)	13 (86.7%)	- -	15 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	2 (13.3%)	13 (86.7%)	- -	15 (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	1 (14.3%)	6 (85.7%)	- -	7 (46.7%)
Total migrant workers	1 (14.3%)	6 (85.7%)	- -	7 (46.7%)

* % of total workforce

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

Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 (0%)	1 (100%)	- -	1 (6.7%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

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

No

Describe how this may vary during peak periods

Peak season in terms of sales is October - March, when the number of workers may increase to approximately 30 (max).

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

Greek
Albanian
Romanian

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Albanian	7%	33%	-	40%
Greek	7%	47%	-	54%
Romanian	0%	6%	-	6%

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	1 (11.1%)	8 (88.9%)	- -	9 (60%)
Salaried workers	1 (16.7%)	5 (83.3%)	- -	6 (40%)

[← Worker analysis](#)

[Worker interviews →](#)

Workers by remuneration type

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	2 (13.3%)	13 (86.7%)	- -	15 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details N/A

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	0 (0%)	1 (100%)	- -	1
Supervisors or team leaders	0 -	0 -	- -	0
Administrative staff	0 (0%)	3 (100%)	- -	3

[← 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 1 group of 2 and 5 individuals. (the rest of the workers were on summer leave, as this is not peak season).

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?

Other (provide details)

No complaints were expressed by any of the interviewed workers.

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

Communication (e.g. from management)
Hours worked, rest days or breaks
Job security
Pay
Work atmosphere (e.g. treatment by supervisors)
Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

Favorable towards management's attitude and working conditions. Workers are familiar with the interview process and are open to the auditor. The workers expressed high satisfaction for the working environment in every aspect.

Attitude of workers' committee/union representatives

The worker representative stated that there is very good communication with the company's management. She is also familiar with the interview process and was very open to the auditor.

Attitude of managers

The manager is familiar and supportive with the audit process. All documents were provided as requested, as well as access to the company's premises.

Workers interviewed by type

	Total
Permanent workers	7

[← Worker analysis](#)

[Measuring workplace impact →](#)

Workers interviewed by type

Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	7

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	0	2	-	2
Workers interviewed individually	1	4	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	1	4	-	5
Total migrant workers interviewed	1	4	-	5

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	4.0%	33.0%	-	37.0%
Last full calendar year (2025)	-	-	-	-
Previous full calendar year (2024)	15.0%	32.0%	-	47.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.1%	1.9%	-	2.0%
Last full calendar year (2025)	-	-	-	-
Previous full calendar year (2024)	1.4%	5.6%	-	7.0%

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

When accidents occur, they are documented in the accident logbook. However, there have been no accidents in the recent years.

[← Worker interviews](#)

[Code area 0 →](#)

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
Systems and evidence examined to validate this code section	The audit was conducted without obstructions to all requested documents, interviewees and the facility. No issues of bribery or threat attempts were raised towards the auditor and no encouragement of any kind of dishonest behavior. An accurate site description (plan and description) was provided to the auditor, as well as all requested documentation. The Sedex policy and the Code of Conduct include the human rights policy statement and are approved by the CEO Mr Peltekiadis on 10/01/2024. The Policy is posted on-site and relevant training is regularly conducted. Evidence examined: SD02-E01 "Sedex Policy", ver. 4/10.01.2024 Code of Conduct, ver. 1/10.01.2024 Training records (doc. D4.2-E03 & D4.2-E04) Worker and management interviews		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	Yes External consultant Mr. Manolis Sdrakas was present during the audit.

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

Management systems

Explanation for management systems grades

The site has a comprehensive forced labour policy and relevant procedure in place, reviewed annually and signed by senior management. It clearly prohibits all forms of forced labour. The policy outlines responsible recruitment principles and applies to all direct and third-party recruitment channels. Supporting procedures are embedded in recruitment, onboarding, and resignation processes.

The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures and compliance with labour practices, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou. However, his responsibilities are not documented in written. No third-party labour agencies are used. Relevant personnel is trained on relevant laws and SMETA expectations.

All workers receive training during induction and through annual refresher sessions on their right to freely leave employment, with no threat of penalty or coercion. Training materials are available and documented and understood by all workers. Management and supervisors are trained on identifying and reporting relevant indicators. Policies are posted and are visible in workplace areas.

The site conducts yearly internal audits (and special internal audits if needed) to check contract terms, document retention, overtime records, and complaints data. Forced labour risks are assessed during internal audits and through monitoring process. According to monitoring methodology, all findings are reviewed by the senior management, with corrective actions implemented.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section

- There was no sign of forced labor, harsh or inhumane treatment.
- The facility does not require workers to lodge deposits as a condition of employment
- No original passport, travel or identity documents are kept - only copies and their CV (stated eg. in the Human Rights Procedure)
- Employment documents and hiring of personnel are according to legal requirements.
- Workers are allowed to resign at any time and to leave the work premises at the end of their shift.
- CCTV is installed only for security reasons in the areas where there are machines and the outdoor areas.
- Payments are made on time once a month, in line with applicable law.
- All workers receive at least the legal minimum wage for standard working hours
- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou.
- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, freedom of association and collective bargaining, freely chosen employment, health & safety issues, child labor, remuneration, working hours, regular work, homeworking, harsh and inhumane treatment, environment, work ethics"
- Training of the worker representatives Mrs Labrini Asimakidou and Mrs Emanuela Shkalla on freedom of association and collective bargaining, handling of complaints, relations between workers etc. on 10/08/2026 by the external consultant Mr Sdrakas.
- Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.
- Training of 21 workers conducted by Mrs Kani Nikoleta on labor issues on 25/08/2025.
- The internal audit was conducted on 04/08/2026, by the external consultant Fotiadis Spyros. No findings were recorded.
- The management review meeting took place on 03/12/2025.

Evidence examined:

- Official List of Personnel with Prot. No. PP880658/13-10-2025, submitted to the Labor Inspectorate
- Employment contracts for 10 workers
- Attendance records for 10 workers for October 2025, February 2026 and July 2026
- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- Code of Conduct, ver. 1/10.01.2024
- D 0A "Human Rights Procedure", ver.4/10-01-2024
- D 01 "Free Employment Procedure", ver.4/10-01-2024

- SEDEX Manual, ver. 6/10-01-2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"
- Training records (doc. D4.2-E03.7 & D4.2-E04)
- Worker interviews

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	Some Improvements Recommended
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

Responsible recruitment procedures are aligned with ILO standards. They include provisions prohibiting contract substitution, retention of personal documents, etc and clearly define fair employment practices. All procedures are implemented across operations and are regularly reviewed.

The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures and managing recruitment systems and risks, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou. However, his responsibilities are not documented in written. The management system representative receives regular training on identifying forced labour risks, documentation procedures, and ethical hiring principles, but HR receive a more general training along with the rest of the workers. Potential non-compliances, are accordingly evaluated and managed.

All workers/employees receive a copy of their employment contract in their native language prior to deployment or hire. Training on employment rights, freedom to terminate employment, and how to raise concerns is conducted at induction and repeated annually. Training material that includes the policies is available and distributed. HR personnel is trained on responsible recruitment and worker protections.

The site conducts routine audits and monitoring of recruitment and employment practices, including verification of eligibility to work and age verification. Contracts are reviewed against actual terms and interviews confirm alignment.

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

Employment documents are according to legal requirements.
 Workers are recruited directly by the company, without the use of employment agencies and no workers were found to pay recruitment fees or related costs.
 All foreign workers have applicable residence permits and copies are kept.
 No young workers under the age of 18 are hired.

- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou.
- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, freely chosen employment, regular work, work ethics etc"

Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.
 Training of 21 workers conducted by Mrs Kani Nikoleta on labor issues (working hours, complaints, rights, breaks etc) on 25/08/2025.

- The internal audit was conducted on 04/08/2026, by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.
- The management review meeting took place on 03/12/2025.

Evidence examined:

- Employment contracts
- Payslips for 10 workers for October 2025, February 2026 and July 2026
- D 0A "Human Rights Procedure", ver.4/10-01-2024
- D 01 "Free Employment Procedure", ver.4/10-01-2024
- D 08 "Regular Employment Procedure", ver.4/10-01-2024
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"
- Training records (doc. D4.2-E03 & D4.2-E04)
- Worker interviews

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?	Yes
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[← Code area 1.A](#)

[Code area 2 →](#)

List the sending countries	The international migrant workers are all permanent residents of the area, living very close to the worksite and none of them need to migrate across international borders to go to work.
Percentage of workers that are migrant	47%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

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

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	Some Improvements Recommended
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

Workers' rights to join unions or participate in worker committees are protected by relevant policies and procedure. They also protect against retaliation or discrimination. The policies are understandable and available in the workers' languages. Fair elections and enabling worker-led meetings are in accordance with policies.

The management system representative/Quality Manager Mrs Nikoleta Kani is informally responsible for supporting worker representation, but there is no written assignment.

She is trained for managing and monitoring worker representation systems. This person coordinates worker committee elections, ensures meeting schedules are maintained, and works with management to review worker feedback.

All workers are informed of their right to join committees or trade unions through induction and annual training. Training is available in appropriate languages and designed to include all workers. Supervisors also receive training on non-interference and supporting freedom of expression.

Committee election records, meeting minutes, and follow-up actions are documented and regularly reviewed by site leadership. Potential issues if raised by workers are tracked through grievance logs and CAP reviews.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

There is no union in place (no such legal requirement).

Worker representative is Mrs Labrini Asimakidou (who is also a member of the H&S Committee) and deputy worker representative is Mrs Emanuela Shkalla. The elections were conducted on 10/08/2026 (due to the departure of the former deputy representative) with the participation of all workers present at the site. However, they will be repeated during peak season, to ensure participation of the majority of the workers.

A national CBA is in place.

- The Quality Manager Mrs Nikoleta Kani is responsible for the implementation of the relevant requirement.
- The rest area (kitchen) with enough space for all workers is provided for the workers for meetings with the worker representative.
- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, freedom of association and collective bargaining etc "

Training of the worker representatives Mrs Labrini Asimakidou and Mrs Emanuela Shkalla on freedom of association and collective bargaining, handling of complaints, relations between workers etc. on 10/08/2026 by the external consultant Mr Sdrakas. Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026.

The rest of the workers will be trained as they return from summer leave.

Training of 21 workers conducted by Mrs Kani Nikoleta on labor issues (working hours, complaints, rights, etc) on 25/08/2025.

- The internal audit was conducted on 04/08/2026, by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.
- The management review meeting took place on 03/12/2025.

Evidence examined:

- Worker interviews
- Worker representatives interview
- The relevant form with the election results and the announcement and contact details of the worker representative (and deputy) are posted on site, dated 10/08/2026
- Training records (doc. D4.2-E03 & D4.2-E04)
- D 02 "Freedom of Association and Collective Bargaining Procedure", ver. 4/10-01-2024
- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- SEDEX Code of Conduct, ver. 1/10.01.2024

- H&S meeting minutes, eg. for 10/08/2026
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

[← Code area 1.A](#)

[Code area 3 →](#)

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	Yes, other (provide details) There are two elected worker representatives (the second one is the deputy representative).
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?	No
Does the membership reflect the nationality composition of the workforce?	Yes

[← Code area 2](#)

[Code area 3 →](#)

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

3. Working conditions are safe and hygienic

Management systems

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

Management systems

Explanation for management systems grades

The site has comprehensive, documented health and safety policies and procedures that are specific, up-to-date, and directly address all major Workplace Requirements under Code Area 3. Policies are tailored to site risks and include roles, review mechanisms, and legal compliance tracking. Procedures are regularly updated following internal reviews, incidents, or changes in processes.

The site has informally designated the Quality Manager/ Management system responsible as responsible for the implementation of the H&S program, however there is no specific written assignment. Also a safety officer is appointed as required by law. Responsibilities are documented in the relevant policy, and the relevant personnel is actively involved in oversight, training, inspections, and committee coordination and H&S committee.

The site has a structured and documented training program. All new workers receive H&S induction before starting work. Ongoing refresher training is conducted based on risk level, and comprehension, and evaluation of training is part of internal audit and site inspections. Training records are well maintained for all categories of workers/employees, and subcontracted personnel.

The implementation and effectiveness of the H&S procedures is monitored, while there are internal audits and KPI tracking. Corrective actions are recorded and verified for closure. Monitoring leads to systemic improvements. However, some improvements are recommended, as there was a gap in monitoring the compliance with legislative requirements, resulting in a relevant finding regarding the training of workers in CPR.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.G Provide sufficient first-aid supplies ons...	Local law	NC ZAF601573157

[← Code area 2](#)

[Code area 4 →](#)

Systems and evidence examined to validate this code section

A basic H&S management system is in place.
 A Health & Safety Risk Assessment has been issued.
 Mrs Nikoleta Kani is the quality manager / production officer and is responsible for internal monitoring of health & safety issues.
 Mr Dimitrios Metallidis is the designated Safety Officer (external associate)
 The H&S Committee consists of Mr Peltekiadis, Mrs Kani, the worker representative Mrs Asimakidou and the external consultant Mr Sdrakas.
 Meetings were conducted on 18/02/2026, 24/06/2026, 10/08/2026.
 Workers are instructed to stop working, seek safety or leave the premises, without the threat or fear of retaliation, when they believe there is imminent danger in the workplace.
 Training is regularly conducted.
 An internal audit was conducted on 04/08/2026 by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all the Code's clauses.
 No findings were recorded.
 The management review meeting took place on 03/12/2025.

Evidence examined:

- D 03 "Health and Safety Procedure", reviewed on 20/03/2025
- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- Safety Officer announcement to the Labor Inspectorate (SEPEnet) with Prot. No: 767313/18-12-2025, valid for period 19/11/2025 – 18/11/2026.
- Official logbook for Safety Officer's in labor notes, stamped by competent authority, No. 3608, 28/05/2014. Latest record on 11/08/2026, signed by the management.
- Health and Safety Risk Assessment dated 10/01/2022
- Safety instructions e.g. fire safety, working in hot season, use of chemicals, First Aid, etc, posted on the announcement board
- The Safety Officer regularly provides instructions during his visits and records them in the logbook. Indicatively, on 21/05/2026 a training was held on electrical shock hazards and correct implementation of machine cleaning.
- Training records of all present personnel for Health & Safety on 10/08/2026 (form D4.2-E03 Special Training on SEDEX – Human rights, Health & Safety): the training included indicatively: First Aid in case of accident or indisposition, PPE, evacuation, fire , use of fire extinguishers etc) and was conducted by Mrs Nikoleta Kani to all workers.
- The training evaluation is recorded in form D4.2-E04 by each worker.
- Mrs Nikoleta Kani was trained in First Aid by IANAP Learning Center and also by the Fire Department.
- However, the total of the workforce has not received training on CPR and Heimlich maneuver (through internal training) with the use of the training material and videos

provided by the Ministry of Labour and Social Security, as required by Law 5239/2025 (article 39).

- Emergency contact information, posted on site both in Greek and Albanian
- Fire safety study for the facility No. 02/2015, 12/02/2015
- Evacuation (fire) drills were conducted on 05/12/2025 and on 29/05/2026. Relevant photographic documentation and report (doc. D 4.7-E02.7) are available. All interviewees described the drill in detail and were fully aware of the evacuation plan.
- Invoices for PPE. Eg. 1) invoice no. 218/16-03-2026 for the purchase of anti-slippery rubber boots (30pairs) by Georgala Bros OE, 2) invoice no. 15812/24-03-2026 for the purchase of nitrile gloves by Pagonidi Bros OE, 3) invoice no. 15633/06-03-2026 for the purchase of nitrile gloves by Pagonidi Bros OE
- Receipt form for safety shoes signed by the workers. Indicatively,
 - Sirma Lamcja received rubber boots on 03/07/2026 and a raincoat on 01/12/2025
 - Ozuni Gezim received boots on 24/03/2026
- Emergency exit signage on site.
- Attestation for electrical safety according to HD 384, dated 22/01/2024, valid until 22/01/2029
- Invoices for fire extinguisher maintenance from Damakoudis Andreas, indicatively issued on 13/08/2026 (40 pcs)
- Air compressor (with pressure vessel) purchased on 07/10/2021 (invoice no. 108 by AIRBLOCK), latest maintenance conducted on 03/03/2026 (annual maintenance is determined by the manufacturer). The relevant report was available. The pressure vessel will need to be certified until 07/10/2026.
- Certificates for lifting capacity of pallet trucks, by CERT1, no. 005233_003_0126, 005233_002_0126, 005233_004_0126, 005233_001_0126, issued on 10/01/2026, valid until 08/01/2028
- Contract with APENTOMOTIKI PELLAS valid through 11/03/2026 – 11/03/2027 for pest control services. Latest pest control conducted on 28/07/2026 (relative certificate was available)
- First aid kit available, in respect with national law (Government Gazette issue (FEK) B 2562, 11/10/2013).
- List of applicable health & safety legislation, available on software application.
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

Findings: non-compliances

ZAF601573157

Non-compliance

Due 2026-10-23

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.G Provide sufficient first-aid supplies onsite, and ensure that adequately trained personnel are available during all shifts.

Time given to resolve

60 days

Issue title

167 - No or inadequately trained first aiders

Verification method

Desktop audit

Description

Law 5239/2022 requires that all of the workers are trained on CPR and Heimlich maneuver through internal training with the use of the training material and videos provided by the Ministry of Labour and Social Security. This specific training has not been conducted yet.

Area of non-compliance/non-conformance

Local law

Intended corrective and preventative actions, based on root cause analysis

The first aid training will be repeated for all workers according to Law 5239/2025 requirements.

Local law reference

Article 39 of Law 5239/2022

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

However, Mrs Kani, who has received certified training on First Aid and is responsible for health & safety issues at the company, trains the workers every year and the latest training of 6 workers took place on 10/08/2026. The interviewed workers also confirmed that they regularly receive first aid training. Also, the company has scheduled to have an official training of some of the workers by the National Emergency Aid Centre (EKAB) on 10/09/2026.

* PDF generated at 15:58 (UTC) on 24 Aug 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, senior manager or business owner 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 Only cleaning products, such as Glass cleaning (sodium hypochlorite)
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No structural additions have been made since the building was constructed.
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	Some Improvements Recommended
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Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
--	-------------------------------

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

Explanation for management systems grades

The site has a documented policy and procedure that address all relevant aspects of child labour prevention, in line with local law and international standards. However they do not include clear written methodologies for verifying the age of all workers—both directly employed and those supplied by third-party labour providers (if applicable) and sub-contractors. The relevant procedure also includes protection measures for young workers, such as assigning only age-appropriate tasks, prohibiting night work, and ensuring adequate supervision. Finally, it includes a remediation plan in the event that an underage worker is identified, but it could include more steps, in order to provide more adequate support. The procedure are reviewed regularly to ensure ongoing compliance.

The site has designated a competent person, who is the Management System representative and Quality Manager, to be responsible for implementing child labour-related policies, however it is not documented in written. Their responsibilities include the authority to enforce procedures across the operation, and adequate resources to carry out their duties effectively. According to their responsibilities they are actively involved in overseeing not only internal processes but also compliance by on site subcontractors. Evidence confirms that child labour issues are included in periodic reviews, and internal audits.

The site provides effective and regular training on child labour policies and procedures to all relevant personnel. Training materials are documented. Interviews confirmed that both workers and managers have a strong understanding of child labour risks, the minimum age of employment, and the procedures to follow if an issue arises.

The site actively monitors the effectiveness of its procedures related to child labour and young worker protection. This includes regular internal audits and checks of identification documents (Part of hiring procedure). Any findings from monitoring activities are reviewed and used to update policies, improve training, or make adjustments to management practices. The monitoring system is structured and implemented consistently, demonstrating a proactive and sustainable approach.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 3](#)

[Code area 5 →](#)

No findings

Systems and evidence examined to validate this code section

The company prohibits child labor. Relevant policy, dated 10/01/2024, is in place. The remediation procedure in case child labor is found, is described in the Child Labor Procedure, but it is quite brief.

Original photographic identification documents are reviewed by the HR to validate that all workers are at least 18 years old at the time of employment. Copies are kept. No child labor takes place and this is not a significant issue in Greece.

The youngest worker in the company is 21 years old (born on 03/02/2005, hired on 17/04/2025)

- The Quality Manager and system responsible has been assigned as responsible to ensure that the relevant policy & procedures are implemented.
- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, child labor, harsh and inhumane treatment, work ethics etc"

Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.

Training of 21 workers conducted by Mrs Kani Nikoleta on labor issues on 25/08/2025.

The internal audit was conducted on 04/08/2026, conducted by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- D 04 "Child Labor Procedure", ver. 4/10.01.2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- Officially submitted list of personnel with Prot. No. PP880658/13-10-2025
- HR personnel records
- Training records (doc. D4.2-E03 & D4.2-E04)
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"
- Worker and HR interviews

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	6%
Enter the legal age of employment	15
Enter the age of the youngest worker identified	21
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	Some Improvements Recommended
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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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Management systems

Explanation for management systems grades

The site has a documented policy and procedures in place that comply with legal requirements and SMETA Code Area 5 standards. These procedures cover most areas of wage compliance, including minimum wage verification, contractual rates, overtime, deductions, but there is no specific written reference to benefit payments, in-kind payments, and payslip issuance. Procedures are reviewed whenever legal updates occur. The documents are clearly written, version-controlled, and accessible to relevant departments.

The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures for wage and benefit compliance, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou and is trained in local wage laws and SMETA standards.

The HR responsibilities are defined in job descriptions, and oversight includes periodic internal audits and payroll accuracy checks.

The site provides workers with clear written information on pay, benefits, overtime, deductions, and insurance contributions before employment begins and whenever changes occur. Training is conducted for workers and relevant staff at induction and repeated periodically. Training content is up-to-date and tailored to the literacy and language needs of workers. Interviews confirmed that workers understood how their wages were calculated. The communication system is comprehensive, inclusive, and effective in ensuring all parties understand wage-related policies.

The site has a well-established monitoring system to ensure ongoing compliance with wage laws and standards. Regular internal audits are conducted to verify minimum wage payments. Payslip sampling and worker interviews are used to validate records, and discrepancies are corrected promptly.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

The legal minimum wage:

- was 880€ gross/month for monthly salaried employees or 39.30€ gross/day for technical workers until 31/03/2026
- is 920€ gross/month for monthly salaried employees or 41.09€ gross/day for technical workers since 01/04/2026.

The company complies with legal minimum wage requirements.

All workers receive the insurances and benefits (including leave entitlements) they are entitled to.

No partial payments with in-kind benefits are made.

No deduction from workers' pay is for disciplinary sanctions. Any deductions for other reasons shall first be agreed with the workers and be according to legal requirements. Workers are provided with clearly written information on the conditions of their employment, before employment begins. All details are described in the employment contracts.

Workers receive a payslip on each pay period with a clear and understandable breakdown of their wages, benefits and any deductions.

Payment is conducted on time at the beginning of the month through bank transfer.

- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou.

- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, remuneration, working hours, regular work, etc"

Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026.

The rest of the workers will be trained as they return from summer leave.

Training of 21 workers by Mrs Kani Nikoleta on labor issues (complaints, rights, working hours, etc) on 25/08/2025

- The internal audit was conducted on 04/08/2026, conducted by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- D 05 "Remuneration and benefits Procedure", ver. 4/10-01-2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- Employment contracts and official announcements to the Labor Inspectorate.
- Pay slips for October 2025, February 2026 and July 2026

- Attendance sheets for October 2025, February 2026 and July 2026
- Bank transfers
- Worker interviews
- Social Insurance attestation, Prot. No. 2896816/17-08-2026, valid until 16/02/2027
- Tax awareness attestation, Prot. No.: 89365985/17-0-2026, valid until 17/09/2026
- Training records (doc. D4.2-E03 & D4.2-E04)
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

[← Code area 4](#)

[Code area 5.A →](#)

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Anker Reference Value Methodology

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Other (provide details) There are only 2 part-time workers and they are provided the same benefits as full-time workers
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Daily Monthly
Is actual wage data available on site for any of these options?	Daily Monthly

[← Code area 5](#)

[Code area 5.A →](#)

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	6.67
	Required hours per week	40.0
	Required hours per month	173.0
Maximum legal overtime hours	Max hours per day	4.33
	Max hours per week	20.0
	Max hours per month	Non applicable
Actual overtime hours	Max hours per day	1.33
	Max hours per week	8.0
	Max hours per month	34.65
Minimum legal wage	Min per hour	6.16
	Min per day	41.09
	Min per week	Non applicable
	Min per month	920.0
Actual minimum wage	Actual per hour	6.16
	Actual per day	41.09
	Actual per week	246.54
	Actual per month	1068.34

Minimum legal overtime wage	Min per hour	7.7
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	7.7
	Actual per day	10.27
	Actual per week	61.6
	Actual per month	264.42

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 workers files (contracts, paylips and attendance sheets) for: - October 2025 (Oct. 1st to Oct. 31st 2025) - February 2026 (Feb. 1st. to Feb. 28th 2026) - July 2026 (July 1st to July 31st 2026)
Are there different legal minimum/legally recognised CBAs wage grades?	Yes - Extra 10% for every 3 years of work experience for monthly salaried employees, and up to 30% - Extra 5% for every 3 years of work experience for daily salaried technical workers and up to 30%
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	66.7% of the workforce receive the legal minimum wage 33.3% receive more than the legal minimum wage

[← 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

[← Code area 5](#)

[Code area 5.A →](#)

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	The living wage calculation and the comparison with the workers’ wages was conducted on 04/07/2026. For most workers, there is no living wage gap. There is reference in the D 05 "Remuneration and benefits Procedure" that an effort is being made to implement a wage improvement plan aimed at providing to all employees at least the calculated living wage. - The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures. Evidence examined: - D 05 "Remuneration and benefits Procedure", ver. 4/10-01-2024 - Living wage calculation record and comparison with the workers’ wages file.		

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

Management systems

Explanation for management systems grades

The site has documented policies and procedures addressing working hours, overtime, and rest periods. These policies are aligned with national law and reflect SMETA expectations. There are no gaps or inconsistencies in implementation or scope, while they cover effectively all Workplace Requirements under Code Area 6. Procedures are regularly reviewed by HR and the Quality Manager/ System representative. The site also maintains documentation to support implementation during both normal operations and peak periods.

There is a well-defined structure of responsibility for managing working hours, with HR personnel directly overseeing timekeeping systems, overtime approval, and rest scheduling, while the CEO Mr Peltrekiadis has the final responsibility for the implementation of the above. However, his responsibility is not officially documented in the relevant procedure.

Responsible staff are well-trained in both legal limits and SMETA requirements, including how to assess exceptional circumstances.

The site provides training and communication on working hour expectations and payslips are understandable and clear to all workers/employees. Workers are aware of their working schedule and are informed of basic policies and legislative context. Relevant training is effective and delivered to all levels.

Voluntary overtime is in place according to procedures. Workers interviewed verified the voluntary nature of overtime, if asked.

The training system is effective, including all relevant personnel.

The site has an integrated and well-documented monitoring system in place to track and manage all aspects of working hours. This includes:

- Real-time timekeeping systems to monitor total weekly hours;
- Documentation and review of any overtime worked, if applicable.

Time records are monitored consistently by HR. Rest days and breaks are routinely reviewed, and internal audits verify compliance across all departments.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

[← Code area 5.A](#)

[Code area 7 →](#)

[← Code area 5.A](#)

[Code area 7 →](#)

Audit company:
**EUROPEAN INSPECTION AND CERTIFICATION
COMPANY(EUROCERT) SA**

Audit reference:
ZAA600224635

Start Date:
2026-08-19

End Date:
2026-08-19

Systems and evidence examined to validate this code section

All workers apart from 2 are full-time and work on a 6-day basis, 6hours and 40min per day, in total 40hours per week.

There is a possibility of working additional hours per week, adding in total no more of 48 hours.

Overtime is voluntary.

Regular working hours are:

- 6:00-13:10 for production workers
- 9:00-16:10 for packaging workers
- 08:30 - 15:40 for office employees (which may vary slightly among the employees).

Occasionally during peak season, the production workers may start work at 5am or start work at midday, or more rarely work a night shift. Such cases have been checked in the sampled workers' files for October 2025. Indicatively, 3 workers worked 22:00 – 05:15 on 30/10/2025.

All workers receive 1 day-off (Sunday) after 6 consecutive days of work.

All workers have the right to paid leave.

- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou.

- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, working hours, regular work etc "

Training of 6 workers by Mrs Kani Nikoleta on labor issues (policies, implementation of the Code, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta on 10/08/2026 and 18/08/2026.

The rest of the workers will be trained as they return from summer leave.

Training of 21 workers by Mrs Kani Nikoleta on labor issues (working hours, complaints, rights, breaks etc) on 25/08/2025

- The internal audit was conducted on 04/08/2026, conducted by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- D 06 "Working hours Procedure", ver. 4/10.01.2024
- D 10 "Work Leave Procedure", ver. 4/10.01.2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- Officially submitted worker list with Prot. No.: PP880658/13-10-2025
- Employment contracts of 10 workers.
- Attendance records for October 2025, February 2026 and July 2026
- Monthly payslips for October 2025, February 2026 and July 2026

- Worker interviews
- Training records (doc. D4.2-E03 & D4.2-E04)
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

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	125%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

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

Explanation for management systems grades

The site has a clearly documented and legally compliant non-discrimination policy that is aligned with SMETA Code and national law. The policy addresses all key protected characteristics, including race, gender, age, nationality, disability, religion, union status, gender identity, and sexual orientation.

Procedures are in place to ensure:

- Non-discriminatory hiring, training, promotion, and termination practices.
- Health checks (where used) are applied only where legally required and not used to exclude or restrict employment unfairly.
- Equal access to grievance mechanisms, and actions are taken to ensure the process is safe, confidential, and inclusive.
- An equity approach is referenced, but is not analytical in actionable steps.

These policies are reviewed at least annually and updated to reflect local legal changes and best practice.

A dedicated manager (Quality Manager - System representative) has been appointed to oversee all non-discrimination efforts. This person is supported by the HR personnel and the top management to ensure full coverage of employment practices. The responsible person is empowered to investigate and manage all the above issues, while his/her responsibilities are defined in writing, and regular reviews are conducted with senior management to evaluate progress and compliance.

The site provides effective and inclusive training on non-discrimination practices to all levels of staff.

Training materials are available in spoken by workers/employees languages and are understandable. Grievance instructions and anonymous reporting options are visibly posted throughout the site.

Workers interviewed demonstrated an understanding of their rights, how to report discrimination or harassment, and trust in the fairness of the system.

The site uses a formal system to monitor, review, and assess the effectiveness of its non-discrimination policies and practices, including internal audits, KPI monitoring and management review. Results from monitoring are discussed at management level.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 6](#)

[Code area 8 →](#)

No findings

[← Code area 6](#)

[Code area 8 →](#)

Systems and evidence examined to validate this code section

No discrimination takes place on any grounds.

All workers receive the same benefits.

There is reference in the Discrimination Procedure that "there is an equity approach in recruitment, training, development, and promotion processes", but relevant actions are not analytically described, except for the fact the recruitment is based only on skills and the general comment "all employment-related matters (salaries, training, opportunities, working hours, type of work, etc.) are addressed based on the principle of equality among employees".

- A complaint box and a special form are available for all workers to submit complaints.

- The Quality manager/ System representative is responsible for monitoring the implementation of relevant procedures and all discrimination issues.

- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, discrimination, harsh and inhumane treatment, work ethics etc"

Training of the worker representatives Mrs Labrini Asimakidou and Mrs Emanuela Shkalla on handling of complaints, relations between workers etc. on 10/08/2026 by the external consultant Mr Sdrakas.

Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, worker representation, complaints, rights, working hours, breaks etc) by Mrs Kani Nikoleta and on 10/08/2026 and 18/08/2026.

The rest of the workers will be trained as they return from summer leave.

Training of 21 workers by Mrs Kani Nikoleta on labor issues (complaints, rights, etc) on 25/08/2025

- The internal audit was conducted on 04/08/2026, conducted by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- SD02-E01 "Sedex Policy", ver. 4/10.01.2024
- SEDEX Manual, ver. 6/10-01-2024
- SEDEX Code of Conduct, ver. 1/10.01.2024
- D 07 "Discrimination Procedure", ver. 4/10.01.2024
- D 09 "Harsh and Inhumane Treatment Procedure", ver. 4/10.01.2024
- D 5.2 "Complaints procedure"
- Complaints box and special form D 5.2-E0.2 for submitting complaints
- Payslips, stating in detail all benefits and deductions (same apply for all workers)
- Worker interviews
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

- Training records (doc. D4.2-E03 & D4.2-E04)

[← Code area 6](#)

[Code area 8 →](#)

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)? 20%

Representation of women in managerial roles (ratio of women workers to women managers) 7%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 0%

Three most common nationalities in managerial and supervisory roles Greek

[← Code area 7](#)

[Code area 8 →](#)

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

Management systems

Explanation for management systems grades

The site has established comprehensive and legally compliant policies and procedures governing employment practices. Written contracts are issued to all workers in a language they understand, and contain all required terms and conditions in accordance with legal and SMETA requirements.

The procedures also clearly address lawful dismissal, redundancy, and contract termination processes.

Policies are reviewed periodically and were found to be implemented consistently across all departments.

The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures and to oversee employment model compliance, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou. The responsible person has a basic understanding of legal obligations, but has not received targeted training on contract structures, regularization processes etc. The Quality Manager/ System representative conducts annual internal checks to verify the correct implementation of procedures.

The responsible personnel coordinate regularly with production to ensure that all employment terms are properly applied.

The site provides structured and ongoing communication and training on employment status and rights. Workers receive detailed information about their contracts and employment terms during induction, and refresher sessions are conducted annually. Training is also provided to all levels of employees, while relevant materials are available and accessible. Workers interviewed confirmed that they understood their contract type and associated entitlements.

A formal monitoring system is in place to track employment models and contract types. HR and Quality Manager conduct regular audits to verify that all workers hold valid, signed contracts, all workers do not exceed legal timeframes, and dismissals and contract changes are handled lawfully.

The site maintains employment data reports. Any findings are addressed through corrective actions and policy updates, demonstrating a proactive and sustainable approach to compliance.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
← Code area 7			Code area 8.A →

No findings

Systems and evidence examined to validate this code section

Work is performed according to the national applicable legislation and written employment contracts are signed by all workers and comply with legal requirements. There is no discrimination in the hiring process.

The company employs directly its workers without any use of employment agencies. No apprenticeships, irregular, sub-contracted or non-employment models of labour are used.

- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures, in collaboration with the HR and Accounting personnel Mrs Elisavet Eleftheropoulou.

- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, freely chosen employment, remuneration, working hours, regular work, homeworking, work ethics etc"

Training of 6 workers by Mrs Kani Nikoleta on labor issues (policies, implementation of the Code, complaints, rights, working hours, etc) by Mrs Kani Nikoleta on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.

Training of 21 workers by Mrs Kani Nikoleta on labor issues on 25/08/2025.

- The internal audit was conducted on 04/08/2026 by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- Employment contracts for 10 workers
- Payslips for the above 10 workers for October 2025, February 2026 and July 2026
- Worker interviews
- Training records (doc. D4.2-E03 & D4.2-E04)
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

8. Regular employment is provided

Data points

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

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

Management systems

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

Management systems

Explanation for management systems grades

The site has clearly documented and consistently implemented policies and procedures in place for managing homeworking, sub-contractors and supplies. Sub-contracting and homeworking is N/A. These policies include a requirement to obtain written approval from clients before any production is subcontracted. There are also procedures for selecting, approving, and monitoring subcontractors and suppliers. Although the site does not currently use sub-contractors and homeworkers, procedures are in place to ensure that, if used, they would be engaged under written terms and subject to regular monitoring to ensure their working conditions meet legal and SMETA Code requirements. The policies are reviewed periodically and updated when needed.

The site has assigned a responsible person (Mrs Nikoleta Kani) to oversee all matters related to subcontracting and supplies. This person is aware about the relevant legal and customer requirements and is supported by other departments such as production. The responsible individual ensures that any potential subcontracting is properly authorized, documented, and monitored. Responsibilities are clearly defined.

Training on subcontracting procedures is provided to relevant staff, including those in production. Training content includes the requirement to obtain client authorization before any outsourcing and how to manage subcontractor and supplies in accordance with SMETA standards.

The training is available in appropriate languages and formats. During interviews, relevant personnel demonstrated a clear understanding of the procedures and confirmed that no subcontracting is currently taking place without client approval.

The site has a structured monitoring process in place to prevent unauthorized subcontracting and ensure that all production remains in-house unless otherwise approved. This includes maintaining a current subcontractor and supplier register and annual evaluation.

Although the site does not currently use sub-contractors and homeworkers, the procedures in place would allow for proper monitoring if they were engaged. Monitoring outcomes are reviewed at management level and any concerns are addressed promptly. The monitoring system is proactive and effective.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 8](#)

[Code area 9 →](#)

No findings

Systems and evidence examined to validate this code section

There is no use of sub-contracting and homeworkers. No such concern was raised to the audit team during the on-site inspection of the production area and the inspection of production records.

- The CEO Mr Peltrekiadis has the final responsibility for the implementation of the relevant procedures and compliance with the ETI code requirements.

Evidence examined:

- Walk-through of the facility and production process
- Production records
- Verification by management

[← Code area 8](#)

[Code area 9 →](#)

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

Data points

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

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? Information not available
The company does request this information from its suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
During the on-site tour and the production documents review, no concerns were raised about unrecorded work or undeclared sub-contracting on site.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

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

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

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

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

Management systems

Explanation for management systems grades

The site has established and implemented a comprehensive written policy that prohibits all forms of harsh or inhumane treatment, including physical abuse, psychological harassment, verbal threats, and any form of workplace violence. The policy includes protections against gender-based violence, bullying, and retaliation and applies to all workers regardless of role or employment status. Procedures are in place to ensure the policy is applied consistently. Violent and harassment risk identification is also part of H&S risk assessment of the company.

The company has assigned and trained a responsible person (Quality manager and System representative Mrs Nikoleta Kani) for implementing and overseeing the anti-harassment and non-violence policy. This person is known to both management and workers and has clear authority to take action when concerns are raised. Roles and responsibilities are documented. The responsible individual, if necessary, coordinates with grievance committee members or worker representatives to ensure concerns are handled fairly and transparently.

The site provides targeted and recurring training to workers, supervisors, and relevant staff on the policy prohibiting inhumane treatment. Training is:

- Delivered during induction and at regular intervals,
- Tailored to literacy and language needs,
- Supported by accessible training material, grievance information, and reporting channels.

Interviews with workers and managers confirmed strong awareness of behavioural expectations and how to report any issues confidentially.

The site actively monitors compliance with its policies through:

- Regular analysis of grievance data and trends
- Worker feedback and internal audits
- Review of disciplinary actions (if applicable) for fairness and consistency.

Monitoring results are discussed during management meetings, and actions are taken when patterns or concerns are identified. If incidents occur, they are logged, investigated, and followed up appropriately.

The system is proactive, preventive, and demonstrates that the site is committed to maintaining a respectful and non-threatening working environment.

Summary of findings

[← Code area 8.A](#)

[Code area 10.A →](#)

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

No threats, harsh or inhumane treatment is allowed under any circumstance.

No disciplinary actions/procedure are applied.

- A grievance mechanism is in place. Non-retaliation policy is in place. A complaint box and special form are available for all workers to submit complaints. No complaints have been submitted in the past 12 months. The interviewed workers confirmed they have a respectful and friendly relationship and no issues of disrespectful behavior are ever raised.

- Workers can also report relevant issues to the worker representative (and deputy)

- Bodily searches are not allowed.

- The Quality manager/ System representative (Mrs Kani) is responsible for monitoring the implementation of relevant procedures and all discrimination issues.

- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, Human rights, harsh and inhumane treatment, work ethics etc"

Training of the worker representatives Mrs Labrini Asimakidou and Mrs Emanuela Shkalla on handling of complaints, relations between workers etc. on 10/08/2026 by the external consultant Mr Sdrakas.

Training of 6 workers by Mrs Kani Nikoleta on H&S issues (see §3) and labor issues (policies, implementation of the Code, complaints, rights, etc) by Mrs Kani Nikoleta on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.

Training of 21 workers by Mrs Kani Nikoleta on labor issues (complaints, rights, etc) on 25/08/2025

Training of the key staff (10 workers) on violence and harassment, conducted by Mr Stikos Antonis on 25/08/2025

Form D4.2-E03 is signed by the trainees for all of the above trainings.

- The internal audit was conducted on 04/08/2026, by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.

- The management review meeting took place on 03/12/2025.

Evidence examined:

- SD02-E01 "Sedex Policy", ver. 4/10.01.2024

- SEDEX Manual, ver. 6/10-01-2024

- SEDEX Code of Conduct, ver. 1/10.01.2024

- D 09 "Harsh and Inhumane Treatment Procedure", ver. 4/10.01.2024

- D 5.2 "Complaints procedure"

- Complaint box and special form D 5.2-E0.2.

- Training material on Violence and Harassment in the Workplace, issued by the Labor Inspectorate.

- Training records (Form D4.2-E03 and training material)

- Worker interviews
 - Doc. E 751.16 "Internal Audit report"
 - Doc. D 6-E01 "Management Review"
-

[← Code area 8.A](#)

[Code area 10.A →](#)

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
	The grievance process is available to all workers
What type of grievance mechanism(s) are available?	- Complaint box and special form D 5.2-E0.2 - Through the worker representative
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

[← Code area 9](#)

[Code area 10.A →](#)

10.A. Environment 2–Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
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

[← Code area 9](#)

Management systems

Explanation for management systems grades

The site has a basic environmental policy in place which outlines general commitments to legal compliance and minimizing environmental impact. However, it is not documented in written.

While the site demonstrated general awareness of environmental obligations, written processes (e.g. for waste segregation, spill prevention, or legal reporting) are incomplete and could lead to non-compliance with both legal obligations and SMETA requirements.

A designated responsible person for environment has been appointed and trained for overseeing all environmental aspects of site operations.

Responsibilities are outlined in writing, and the person responsible for environment works in coordination with maintenance, production, and health and safety teams to implement environmental procedures effectively.

Environmental awareness is embedded in the site's communication and training practices. Environmental topics are included in new worker induction and ongoing training

Posters and signage are used around the site to reinforce good environmental practices (e.g. waste sorting, energy saving, water usage). Workers interviewed demonstrated understanding of how their tasks impact the environment and what behaviours are expected.

Training records are maintained and reviewed periodically for coverage and effectiveness.

The site has an active environmental monitoring system in place. Data is routinely collected and reviewed on key performance indicators on the environmental aspects that are identified.

Monitoring results are shared with management, and follow-up actions are tracked. Internal audit includes environmental issues. However, more thorough monitoring of the legislation compliance is required, as there has been evidence of non-compliance with a legislative requirement regarding official reporting, which had not been tracked during the internal audit.

Summary of findings

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

10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	Local law	NC ZAF601573158
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[← Code area 9](#)

Systems and evidence examined to validate this code section

Environmental permit available.
The only hazardous materials used are cleaning products. List and MSDS available.
A list of applicable legislation is available.
Mrs Nikoleta Kani (Quality manager) is responsible for the implementation of relevant procedures.
- Training of the system representative Mrs Kani Nikoleta and 6 workers was conducted on 10/08/2026 by the external consultant Mr Sdrakas on "Policies, implementation of the Code, environment etc"
Training of 6 workers by Mrs Kani Nikoleta on environmental issues by Mrs Kani Nikoleta on 10/08/2026 and 18/08/2026. The rest of the workers will be trained as they return from summer leave.
- The internal audit was conducted on 04/08/2026, by the external consultant Fotiadis Spyros. The respective report (checklist) is very analytical on all of the Code's clauses. No findings were recorded.
- The management review meeting took place on 03/12/2025.

Evidence examined:

- Standard Environmental Commitments, Prot. No. 695978(3056)/2-11-2021
- Procedure D 10 B2 "Environmental Procedure"
- Training records (doc. D4.2-E03 & D4.2-E04)
- Electronic Waste Registry (HMA) No.: 28584. Report submission certificate for 2025, submission No. 28584-1-11
- Registration in National Producers Register (EMPA) for packages of: plastic, paper and cardboard. Register No.: 8184 (certificate valid until 17/11/2026)
- Certificate No. 85233 by the Hellenic Recovery Recycling Corporation (HERRCO/ EEAA) for the company's reporting on packaging material for 2025, issued on 07/04/2026
- Solid waste is mainly pomegranate peels, that are submitted to farmers, e.g. delivery note No. 3201/04-08-2026 to Badakis A., 8500kg
- Wastewater is collected in a tank and periodically received by external company, e.g. invoice No. 311/14-04-2025 and No. 315/ 30-04-2025 to Charalabopoulos.
- Juice production is at a very low level.
- Inspection and maintenance of the cooling chambers is conducted by the company "Criogen Bourlis". The latest inspection was conducted on 05/08/2026.
The company has not submitted the Electronic Equipment Inspection Report to the F-Gases & ODS Monitoring Information System, as required by the Ministerial Decision YPEN/DDED/85858/2124/2021 (Government Gazette Issue B 6777/31.12.2021) for the inspection and maintenance of the cooling chambers.
- Fire drills conducted on 05/12/2025 and on 29/05/2026 conducted by Mrs Kani.
- List of applicable legislation, available on software application.
- MSDS of cleaning products
- Doc. E 751.16 "Internal Audit report"
- Doc. D 6-E01 "Management Review"

[← Code area 9](#)

Findings: non-compliances

ZAF601573158

Non-compliance

Due 2026-10-23

Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

608 - No public/external reporting on environmental performance and it is required by law

Area of non-compliance/non-conformance

Local law

Description

The company has not submitted the Electronic Equipment Inspection Report to the F-Gases & ODS Monitoring Information System, as required by the above legislation, for the inspection and maintenance of the cooling chambers.

Intended corrective and preventative actions, based on root cause analysis

The said report will be submitted.

Local law reference

Ministerial Decision YPEN/DDED/85858/2124/2021 (Government Gazette Issue B 6777/31.12.2021)

* PDF generated at 15:58 (UTC) on 24 Aug 2026. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 10.A](#)

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 site does not have any environmental or energy management certificates.

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](#)

Attachments



[WC men085053.jpg](#)



[Cutting and arils separation.jpg](#)



[WC ladies.jpg](#)



[Evacuation route plan3.jpg](#)



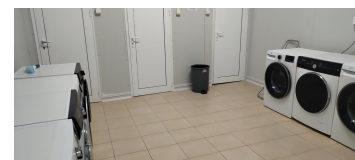
[Fire extinguishing means2.jpg](#)



[WC production area085038.jpg](#)



[Fire hose.jpg](#)



[WC ladies2.jpg](#)



[Assembly point signage.jpg](#)



[Complaints box.jpg](#)



[Cooling chambers area.jpg](#)



[Fire alarm.jpg](#)



[Fire extinguishing means.jpg](#)



[IMG_20260819_085617.jpg](#)



[Cutting.jpg](#)



[Emergency exit1.jpg](#)



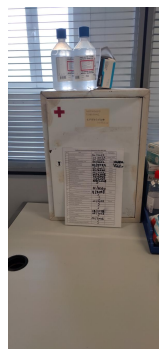
[Emergency exit2.jpg](#)



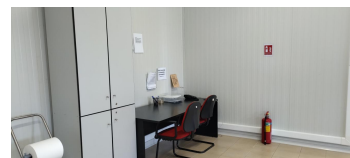
[Kitchen.jpg](#)



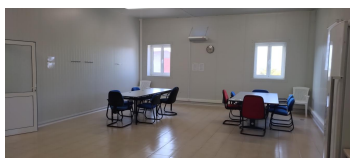
[First aid kit content list.jpg](#)



[Kitchen-rest area.jpg](#)



[Sorting.jpg](#)



[Kitchen-rest area2.jpg](#)

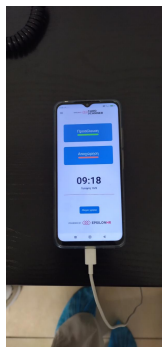


[Evacuation route plan2.jpg](#)



[First aid kit.jpg](#)





[Electronic attendance system.jpg](#)



[Lockers2.jpg](#)



[Emergency contact numbers.jpg](#)



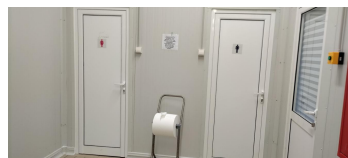
[Air compressor area.jpg](#)



[Pressure vessel.jpg](#)



[Evacuation route plan1.jpg](#)



[WC offices.jpg](#)



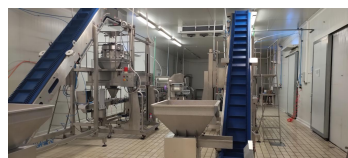
[PPE use signage.jpg](#)



[Assembly point.jpg](#)



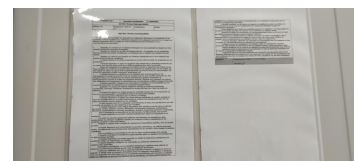
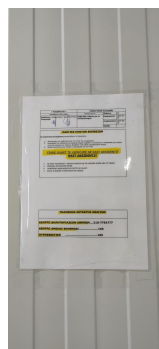
[Air compressor.jpg](#)



[Packing machines.jpg](#)



[Air compressor maintenance.jpg](#)



[Air compressor instructions.jpg](#)



[Lockers.jpg](#)



[First Aid instructions.jpg](#)



[SEDEX Policy.jpg](#)



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