MOXIE GARMENTS MANUFACTURER L.L.C.

Garment manufacturer · Caps & Gowns · School Uniforms · Hospitality · Healthcare

Compliance Monitoring Procedure

Company	Moxie Garments Manufacturer L.L.C.
Trading names	Moxie; Caps & Gowns
Divisions	Graduation caps and gowns; school uniforms; hospitality and corporate uniforms; healthcare uniforms
Production facility	Warehouse S.14 (Shed 14), 18th Street, Al Quoz Industrial Area 1, Dubai, United Arab Emirates
Workforce	A full-time team, plus part-time workers during peak seasons
Document version	1.0
Effective date	September 2026
Approved by	Ansar Yawar, Owner
Next scheduled review	September 2027
Review cycle	At least annually, or earlier when UAE law, customer requirements, operations or identified risks change

This procedure explains how Moxie Garments Manufacturer L.L.C. checks that its ten Corporate Compliance & Responsible Business Policies are followed in practice: who checks what, how often, and which records prove it.

It is designed for a single-site garment manufacturer with a full-time team and additional part-time workers in peak seasons, where the Owner is directly involved in day-to-day operations.

1. Roles and responsibilities

These roles are responsible for applying the policies and carrying out the checks in this procedure.

Role	Compliance responsibilities
Owner (Ansar Yawar)	Overall accountability; approves policies; receives and investigates concerns; data protection lead; approves gifts above AED 250, sponsorships and any subcontracting; chairs the annual management review.
Division Managers (Caps & Gowns, School Uniforms, Hospitality & Corporate, Healthcare)	Customer relationships, site visits and measurement teams for their division. The Caps & Gowns and School Uniforms managers are responsible for safeguarding during school and university visits.
Production Supervisor	Health and safety on the production floor; monthly inspections; machine maintenance; fire drills; needle control; quality checks; supplier certificates; waste records.
HR / PRO	Employment contracts, visas and Emirates IDs; WPS payroll; working hours and overtime; new-hire checks; training and acknowledgement records.
Customer Service & Webshop Lead	Access to the Caps & Gowns webshop, the school uniform ordering system, the payment portal and email; data requests from students and parents; deletion of expired order data.
All employees	Follow the policies, take part in training, and report concerns, hazards and incidents.

2. Communicating the policies and training

- **Induction:** on their first day, every new employee is briefed on the policies, emergency exits, machine safety and how to raise a concern, in a language they understand, and signs the Policy Acknowledgement Register (Appendix A).
- **Notice board:** a one-page policy summary, the speak-up message and emergency information are displayed in the production area.
- **Annual refresher:** all employees receive a refresher briefing each year, recorded in the training record.
- **Role-specific training:** measurement and fitting teams receive a safeguarding briefing before each graduation and back-to-school season; employees with webshop or email access receive data protection and payment security training; embroidery machine and powered cutter operators receive machine-specific safety training.
- **Policy changes:** material changes are briefed to affected employees, who sign the register again.

3. Monitoring schedule

The checks below are carried out on schedule. Any issue found is recorded in the Concern & Corrective Action Register (Appendix C) and handled under section 5.

3.1 Health, safety and fire (Policy 5)

Check	How often	Responsible	Evidence
Workplace inspection using the checklist in Appendix B	Monthly	Production Supervisor	Signed checklist
Walk-through: exits and aisles clear, guards fitted, irons safe	Daily, before work starts	Production Supervisor	Issues logged in Appendix C
Fire alarm and extinguisher service by a Civil Defence-approved contractor	As Civil Defence requires, at least annually	Owner	Service certificates
Fire evacuation drill	Twice a year	Production Supervisor	Drill log (date, evacuation time, issues)
Machine maintenance and tag-out of faulty machines	Monthly and on breakdown	Production Supervisor	Maintenance log
Review of incidents, needle-stick injuries and near misses	Monthly	Owner	Incident log
Work injuries reported to MOHRE within 48 hours	Each injury	Owner	MOHRE report and incident log
Supervisor and trained first-aider present on every shift	Each shift when running multiple shifts	Production Supervisor	Shift roster
Risk assessment review	Annually, after a serious incident or new machine	Production Supervisor	Dated risk assessments

3.2 Labour and modern slavery (Policy 7)

Checks on pay, working hours, permits, insurance, accommodation and fair treatment for full-time, part-time and seasonal workers.

Check	How often	Responsible	Evidence
Payroll check: every employee paid in full and on time through WPS	Monthly	HR / PRO, approved by Owner	WPS salary transfer confirmation
Working hours checked: breaks, overtime (2 hours a day, 144 hours in 3 weeks), Ramadan hours and correct overtime pay	Monthly; weekly in peak seasons	HR / PRO	Timesheets and overtime records
New-hire file: MOHRE contract, age verified as 18+, signed no-recruitment-fee declaration	Every new hire	HR / PRO	Personnel file checklist
Visa, Emirates ID and labour card expiry tracking	Monthly	HR / PRO	Employee register
Health insurance active for every employee; employees reminded to keep ILOE unemployment insurance active	At hiring and each renewal	HR / PRO	Insurance certificates
MOHRE-registered headcount (full-time and part-time) checked against Emiratisation thresholds and any MOHRE notification	Quarterly	HR / PRO, reported to Owner	MOHRE and Nafis records
Staff accommodation registered with MOHRE, if 50 or more workers earn AED 1,500 a month or less	Annually	HR / PRO	Labour Accommodation System record
Confidential check-in with at least 10 employees: own passports held, no fees paid, overtime voluntary, fair treatment	Annually	Owner	Signed check-in notes
Review of grievances raised	Quarterly	Owner	Concern & Corrective Action Register

3.3 Ethics and anti-bribery (Policies 1, 2 and 6)

Check	How often	Responsible	Evidence
Gifts and hospitality register review	Quarterly	Owner	Gifts and hospitality register
Conflict of interest declarations from staff dealing with institutions or suppliers	Annually and on any change	Owner	Signed declarations
Sponsorships, donations or special discounts to institutions approved in writing	Each instance	Owner	Written approval and institution agreement
Supplier payments matched to purchase orders, invoices and deliveries	Monthly	Owner / accounts	Purchase and payment records

3.4 Data protection and payment security (Policy 8)

Check	How often	Responsible	Evidence
Access review of webshop admin, uniform ordering system, payment portal and email; leavers and unneeded access removed	Quarterly, and on the day an employee leaves	Customer Service & Webshop Lead, approved by Owner	Access review log

Check	How often	Responsible	Evidence
Student and child order data past the retention period deleted or anonymised	Annually, after graduation season and school year	Customer Service & Webshop Lead	Deletion record
Paper order lists and measurement sheets shredded after dispatch	Each order; checked monthly	Production Supervisor	Appendix B checklist
Access, correction and deletion requests answered within 24 hours	Each request	Customer Service & Webshop Lead	Request log

3.5 Safeguarding at institutions (Policy 9)

Check	How often	Responsible	Evidence
Valid police Good Conduct Certificate for everyone who visits schools or universities	Before each graduation and back-to-school season, and before a new person's first visit	Caps & Gowns and School Uniforms Division Managers	Good Conduct Certificate register
Safeguarding briefing for measurement and fitting teams	Before each graduation and back-to-school season	Caps & Gowns and School Uniforms Division Managers	Signed briefing record
Visit log completed; any concern reported to the school's DSL	After each visit	Division Manager leading the visit	Institution visit log

3.6 Product safety, quality and suppliers (Policy 10)

Checks on materials, finished garments, suppliers and subcontracting.

Check	How often	Responsible	Evidence
OEKO-TEX Standard 100 certificates or lab reports on file and in date for fabric and trim suppliers	Before first bulk order; checked annually	Production Supervisor	Supplier certificate file
Incoming fabric inspection: colour against approved sample, defects, width	Every delivery	Production Supervisor	Incoming inspection record
Broken-needle log review	Weekly	Production Supervisor	Broken-needle log
Final inspection: sizes, embroidery spelling, stitching, labels, ties and tassels	Every order before dispatch	Production Supervisor	Order QC record
Signed Supplier Code of Conduct from suppliers and external processing vendors	At onboarding; renewed annually	Owner	Signed codes and approved supplier list
No subcontracting without written approval	Each instance; reviewed quarterly	Owner	Subcontracting approvals

3.7 Licences, registrations and legal updates

Check	How often	Responsible	Evidence
Trade and industrial licence renewed; MoIAT Industrial Registry updated	Annually, before expiry	Owner	Licence and registry confirmation
Dubai Civil Defence certificate valid	Annually	Owner	Certificate

Check	How often	Responsible	Evidence
UAE legal requirements register checked for changes in the law	Annually, at the management review	Owner	Updated register

3.8 Environment (Policy 4)

Check	How often	Responsible	Evidence
Waste collected by Averda Environmental Services	Monthly	Production Supervisor	Collection records and invoices
Electricity and water use reviewed from DEWA bills	Quarterly	Owner	DEWA bills
External processing vendors hold valid licences	At onboarding; annually	Owner	Vendor licence file

4. Raising and handling concerns

- Anyone — an employee, student, parent, institution or supplier — can raise a concern in person or in writing, in any language, with a supervisor or directly with the Owner.
- Concerns involving the Owner can be raised with any Division Manager.
- Every concern is logged in Appendix C and acknowledged within **2 working days**.
- The Owner, or a Division Manager where the Owner is involved, investigates, keeps the details confidential and records the outcome.
- Moxie does not tolerate retaliation against anyone who raises a concern in good faith.
- A safeguarding concern about a student is reported the same day to the institution's Designated Safeguarding Lead, as set out in Policy 9.

5. Corrective and preventive action

Every issue found through an inspection, incident, concern, complaint or customer audit follows the same steps:

1. **Record** the issue in the Concern & Corrective Action Register.
2. **Contain** it immediately — for example, tag out a machine, clear an exit or remove system access.
3. **Find the cause**, not just the symptom.
4. **Act:** agree a corrective action with a named owner and due date, such as training, a process change, closer supervision, a supplier review or disciplinary action.
5. **Verify** that the action worked.
6. **Close** the entry, with the date and the initials of the person who verified it.

Escalation

The following are escalated to the Owner on the same day: a serious injury or fire; a safeguarding concern; any sign of forced labour, recruitment fees or passport retention; suspected bribery or fraud; a personal data breach; or a product safety defect. Where an institution or authority must be informed, Moxie does so without undue delay — for a personal data breach affecting an institution's students, within 72 hours of confirming it.

6. Records and evidence

Compliance records are kept in a compliance file — a paper binder with a matching digital folder — organised by policy number, so that records can be produced quickly during a customer audit. Records are kept for at least three years, or longer where UAE law or a customer contract requires.

7. Annual management review

Each September, before the policy review date, the Owner holds a management review with the Division Managers, the Production Supervisor and HR / PRO. The review covers:

- results of the monitoring checks in section 3;
- incidents, concerns and complaints, and whether corrective actions worked;
- findings from customer audits and supplier reviews;
- changes in UAE law and institution requirements;
- training completion and policy acknowledgements; and
- people and resources needed for the next graduation and back-to-school seasons.

Decisions and policy updates are minuted, and material changes are communicated to employees.

8. Customer audits

Moxie welcomes supplier audits and due diligence reviews by the institutions it serves. On request, Moxie gives auditors access to its policies, records and production facility, makes the relevant people available, and agrees a corrective action plan with deadlines for any findings, tracked to closure in Appendix C.

Management commitment

Management is committed to applying this procedure, providing the resources it needs, and acting on what the monitoring shows.

Approval and revision history

These documents are approved by the management of Moxie Garments Manufacturer L.L.C. Management provides the time, people and resources needed to apply them, and reviews them at least once a year.

Name	Ansar Yawar
Position	Owner
Signature	
Date	

Revision history

Version	Date	Description	Approved by
1.0	September 2026	First formal issue of the Compliance Monitoring Procedure, with named responsibilities, a monitoring schedule and record templates.	Ansar Yawar

Appendix A — Policy Acknowledgement Register

By signing, I confirm that Moxie's Corporate Compliance & Responsible Business Policies (Version 1.0) were explained to me in a language I understand, that I had the chance to ask questions, and that I agree to follow them.

No.	Employee name	Role	Language briefed in	Date	Signature
1					
2					
3					
4					
5					
6					
7					
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11					
12					
13					
14					
15					
16					

Appendix B — Monthly Workplace Inspection Checklist

Complete this checklist during a walk-through of the whole production facility each month.

Month	
Inspected by	
Signature	

Check	Yes / No	Comments and action
Emergency exits unlocked, signed and free of fabric rolls, cartons and machines		
Aisles between sewing machines clear		
Fire extinguishers in place, accessible and with in-date service tags		
Fire alarm panel shows no faults		
Evacuation plan and assembly point displayed		
First-aid kits complete and in date; first-aider on duty		
Needle and belt guards fitted on all sewing, overlock and embroidery machines		
Faulty machines tagged out of use		
Cables, plugs and extension leads undamaged; no overloaded sockets		
Irons on heat-resistant rests; pressing equipment in good condition		
Cut-resistant gloves available at the cutting table		
Machine oil, spot cleaners and adhesives labelled and stored safely; safety data sheets available		
Lighting, ventilation and air conditioning working		
Drinking water, toilets and rest area clean		
Broken-needle log up to date		
Fabric offcuts and general waste separated; Averda collection on schedule		
Paper order lists and measurement sheets from dispatched orders shredded		
Policy summary and speak-up information displayed on the notice board		

Record every “No” in the Concern & Corrective Action Register (Appendix C).

Appendix C — Concern & Corrective Action Register

Record every issue from inspections, incidents, employee concerns, customer complaints, customer audits, supplier reviews and management reviews.

Ref.	Date raised	Issue or concern (and source)	Action, owner and due date	Closed and verified (date, initials)