

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 & 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 following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & 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
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 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 and site details

Audit details

Sedex company reference	ZC5000032965	Auditor company name	BUREAU VERITAS CPS - ASIA
Date of audit	2024-11-07	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1000038609	Site name	Guilin Zhanji Home Products Co Ltd
Business name	Guilin Iango Co Ltd	Site address	China 541004 Jinjiping Industrial Park, Lipu City,, Guilin City, CN
Site phone	+86-773-3557233	Site email	zoe-qin@iangohanger.com

Audit parameters

Time in and out	Day 1		Day 2	
	In	08:00	In	08:00
	Out	17:00	Out	12:00
Audit type	Full initial			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Ms. Li / Admin manager			
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	No worker union was established in the factory.		
Reason for absence during the audit	No worker union was established in the factory.		
Reason for absence at the closing meeting	No worker union was established in the factory.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> 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. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>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.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	Nil		
Lead auditor	Cindy Chen	APSCA Number	21704044
Additional auditor			
Date of declaration	2024-11-08		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Ms. Li
Title	Admin manager
Date of declaration	2024-11-08

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC ZAF600699525
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600699526
	3.N Maintain a log of all hazardous substance...	§3	NC ZAF600699527
	3.H Where identified as necessary to reduce r...	§4	NC ZAF600699528
	3.M Ensure all machinery is installed, mainta...	§5	NC ZAF600699529
	3.O Implement an appropriate electrical safet...	§6	NC ZAF600699530
	3.O Implement an appropriate electrical safet...	§7	NC ZAF600699531
	3.O Implement an appropriate electrical safet...	§8	NC ZAF600699532
	3.B Conduct risk assessments regarding the po...	§9	NC ZAF600699533
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§10	NC ZAF600699534
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§11	NC ZAF600699535

Local law issues

§1	<p>In accordance with Article 27 of the Regulation For Chemical Usage Safety in Work Place: Staff and workers are entitled to receive: (1) Date and information in description of the specific characteristics, hazardous ingredients, and safety precaution marks of the chemicals to be used in the working premises, and instructions upon safety techniques, etc. (2) Information concerning the probability of occurrence of harm against safety and health of staff and workers caused by hazardous chemicals in the working process. (3) Trainings upon safety techniques, including trainings with regard to prevention and control, and danger-avoiding methods, handling of emergency cases, or emergency measures. (4) Labor protection articles in conformity to State stipulations.</p> <p>根据《工作场所安全使用化学品规定》第27条：职工有权获得：(1)工作场所使用化学品的特性、有害成分、安全标签以及安全技术说明书等资料；(2)在其工作过程中危险化学品可能导致危害安全与健康的资料；(3)安全技术的培训，包括预防、控制、及防止危险方法的培训和紧急情况处理或应急措施的培训；(4)符合国家规定的劳动防护用品。</p>
§2	<p>In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antiseptis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.</p> <p>根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。</p>
§3	<p>In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed.</p> <p>根据《工作场所安全使用化学品规定》第14条：(1)使用单位购进的化学品需要转移或分装到其他容器时，应标明其内容。对于危险化学品，在转移或分装后的容器上应贴安全标签；(2)盛装危险化学品的容器在未净化处理前，不得更换原安全标签。</p>
§4	<p>In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.</p> <p>根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。</p>

S5	<p>In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.</p> <p>Article 6.3 of Code of Design of Manufacturing Equipment Safety and Hygiene, for supercooling and overheating, if the hot or supercooled parts of the production equipment may cause danger, they must be equipped with anti-contact shielding.</p> <p>根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。</p> <p>根据《生产设备安全卫生设计总则(GB5083-1999)》第6.3 过冷与过热，若生产设备的灼热或过冷部位可能造成危险，则必须配置防接触屏蔽。</p>
S6	<p>In accordance with Article 5.1.2 of the General Guide for Safety of Electric User (GB/T13869-2017), electric circuit in use must have sufficient insulation strength, mechanical strength and conductive capability and the installation of which should meet the standards for corresponding electrical devices. 根据《用电安全导则GB/T13869-2017》第5.1.2条：用电产品的电气线路须具有足够的绝缘强度、机械强度和导电能力，其安装应符合相应产品标准的规定。</p>
S7	<p>In accordance with Article 5.1.1 of the General Guide for Safety of Electric User (GB/T13869-2017), there shall be sufficient safety path and operation space around the electric installation. No flammable, explosive or corrosive material shall be stored near the electric installation. 根据《用电安全导则GB/T13869-2017》第5.1.1条：一般情况下，用电产品的周围应留有足够的安全通道和工作空间，且不应堆放易燃、易爆和腐蚀性物品。</p>
S8	<p>In accordance with Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, the electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen.</p> <p>6.2 The material of signs: Safety signs should be made of durable material. The materials which will be deformed or deteriorated when wet and flammable material are generally shall preferably not be used. The insulation material should be used at workplace where there is risk of electric shock. 根据《安全标志及使用导则(GB 2894-2008)》警示标志2-7，当心触电警示标志应安装在有可能发生触电危险的电器设备和线路，如：配电室、开关等。</p> <p>6.2 标志牌的材质：安全标志牌应采用坚固耐用的材料制作，一般不宜使用遇水变形、变质或易燃的材料。有触电危险的作业场所应使用绝缘材料。</p>
S9	<p>In accordance with Article 20 of Provisions on the Administration of Occupational Health at Workplaces, the employer with serious occupational hazards shall entrust an occupational health technical service institution with corresponding qualification to carry out the detection of occupational hazards at least once a year and the assessment of the current situation of occupational hazards at least once every three years.</p> <p>The employer with general occupational hazards shall entrust an occupational health technical service institution with corresponding qualification to carry out the detection of occupational hazards at least once every three years. 根据《工作场所职业卫生管理规定》第20条 职业病危害严重的用人单位，应当委托具有相应资质的职业卫生技术服务机构，每年至少进行一次职业病危害因素检测，每三年至少进行一次职业病危害现状评价。</p> <p>职业病危害一般的用人单位，应当委托具有相应资质的职业卫生技术服务机构，每三年至少进行一次职业病危害因素检测。</p>

S10

In accordance with Article 73 of the Labor Law of the People’s Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.

In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium.

根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：(一)退休；(二)患病、负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。





































根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。


S11


In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.


根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。


Management systems

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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

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

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000032965	
Sedex site reference	ZS1000038609	
Company name	Guilin Iango Co Ltd	
Business ownership type	GOODS	
Site name	Guilin Zhanji Home Products Co Ltd	
Site name in local language	广西荔浦市金鸡坪工业园区	
GPS location	GPS address	Jinjiping Industrial Park, Lipu City, Guilin City, Guangxi province, China
	Coordinates	Latitude: 24°29'17"N Longitude: 110°26'15"E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Ms. Li
	Job title	Admin manager
	Phone number	+86-773-3557233
	Email	zoe-qin@iangohanger.com
Applicable business and other legally required business license numbers and documents	Business license: 91450331675022961B. Valid from May 26 , 2008 to long term.	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Manufacture of other products of wood; manufacture of articles of cork, straw and plaiting materials
	Secondary	
	Other	
Product type	Coat hangers	
Process overview	The factory specialized in the manufacture of coat hangers. The main production processes including cutting, polishing, drilling, injection, flocking, spraying, assembly and packing. The main equipment used in the factory were polishing machines, injection machines and spraying machines etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	9400m ²	
Building 1	Last construction works on site	2014
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Polishing workshop
Building 2	Last construction works on site	2014
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Polishing workshop

Site scope

Building 3	Last construction works on site	2014
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Warehouse, spraying and packing workshop
Building 4	Last construction works on site	2009
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Injection, cutting and drilling workshop
Building 5	Last construction works on site	2009
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Flocking and packing workshop
Building 6	Last construction works on site	2009
	If building is shared, provide details	The building wasn't shared.
	Number of floors	1
	Description of floor activities	Canteen
Building 7	Last construction works on site	2009
	If building is shared, provide details	The building wasn't shared.
	Number of floors	3
	Description of floor activities	The 1st floor of this building was used for office and the 2nd to 3rd floor of this building was used for dormitory.
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	

Site scope

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

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not provided
The factory didn't provide transport for employees.

Work patterns

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

Is there any night or back shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

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? Yes
The factory had assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

Yes

Comprehensive risk assessment was conducted to evaluate policy and procedure effectiveness.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	22 (25.6%)	64 (74.4%)	- -	86 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	22 (25.6%)	64 (74.4%)	- -	86 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	3 (3.5%)	3 (3.5%)	- -	6 (7%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	3 (3.5%)	3 (3.5%)	- -	6 (7%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Hubei and Henan province.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (1.2%)	0 (0%)	- -	1 (1.2%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods N/A. No peak season.

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	26%	74%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	22 (25.6%)	64 (74.4%)	- -	86 (100%)
Salaried workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	22 (25.6%)	64 (74.4%)	- -	86 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

No other payment.

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (2.3%)	1 (1.2%)	- -	3
Supervisors or team leaders	1 (1.2%)	1 (1.2%)	- -	2
Administrative staff	4 (4.7%)	1 (1.2%)	- -	5

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 5 employees.

Did workers understand the purpose of the audit? Yes

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

Was there any indication that workers had been 'coached' in how they should respond to questions? No

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

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) Nothing to report
What did the workers like the most about working at this site?	Pay Communication (e.g. from management)
Additional comments	Apart from the 10 workers interviewed listed in the worker analysis table, another 2 employees were interviewed for business ethics and 2 employees for environment as this is a 4-pillar audit. Confidential private interview was conducted with employees from various sections in a private area. In general, sampled employees' attitude to the factory was favourable. Information gathered from sampled employees was mostly consistent with the documents that the factory had provided. No complaint was raised during employee interview.
Attitude of workers' committee/union representatives	The worker representatives are satisfied with the working condition, working hours and factory management. No complaint was raised during interview.
Attitude of managers	During the opening meeting, auditor explained the audit scopes and audit standards to the factory management, factory management showed cooperation and transparency during the visit. Auditor gained full access to factory tour, document review and interviews with management members and workers, a full audit was finished as scheduled. During the factory tour, management was willing to unlock the places which were locked before auditor accessed. Factory management also allowed auditor to select the samples and interview production workers in a private and confidential manner.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	2	3	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	1	1	-	2
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	1	1	-	2

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded? Yes

Blank accident record was available as no accident occurred.

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

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current systems: Facility management were cooperative with this verification, they granted access to all documents/ facility grounds/ workers, photos. A written human rights policy statement was established and approved by G.M., it's also trained to relevant personnel.</p> <p>Evidence examined: Document review - Training records -A manual created by the factory which contained all required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements -Social compliance policy and procedure -Workers' information about their rights -Relevant permits and business license and lease contract Management interview Worker interview</p>		

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 sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy to ensure employment was freely chosen. The factory did not require deposit or withhold employees' ID cards. The factory did not limit the employees' freedom. There was no forced, bonded or involuntary prison labor. Employees were free to leave their employer after reasonable notice. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures. Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems: The factory established a policy to ensure employment was freely chosen. The policy included the following clause:</p> <ol style="list-style-type: none"> 1. The factory did not require deposit or withhold employees' ID cards. 2. The factory did not limit the employees' freedom. 3. There was no forced, bonded or involuntary prison labor. 4. Employees were free to leave their employer after reasonable notice. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Policy documents 2. Worker interviews 3. Personnel files (to check for ID's) 4. Contracts to establish notice periods 		

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
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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
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1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Based on documents review, management and employee individual interviews, all employees were directly employed by factory, they all came from China, no agency used. Their original photographic identification (ID cards) was validated, employees were trained on policies of working conditions, living conditions, employment terms, living costs, wages and benefits etc. No child labor or young labor noted in the factory. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures. Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems: The factory established a policy to ensure employment was freely chosen. The policy included the following clause:</p> <ol style="list-style-type: none"> 1. The factory did not require deposit or withhold employees' ID cards. 2. The factory did not limit the employees' freedom. 3. There was no forced, bonded or involuntary prison labor. 4. Employees were free to leave their employer after reasonable notice. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Policy documents 2. Worker interviews 3. Personnel files (to check for ID's) 4. Contracts to establish notice periods 		

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 (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	7%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	6 workers migrated from domestic Hubei and Henan provinces to work at the factory.

Recruitment fees

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

Were recruitment fees or costs identified during worker interviews? No

The factory directly recruited workers, and no recruitment fees or costs were identified during this audit.

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on freedom of association. Based on documents review, management and employee individual interviews, all employees were directly employed by factory, they all came from China, no agency used. Their original photographic identification (ID cards) was validated, employees were trained on policies of working conditions, living conditions, employment terms, living costs, wages and benefits etc. No child labor or young labor noted in the factory. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures. Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- There was a worker committee available in the factory.
- Suggestion box was used for employees to put forward any idea.
- The right to freedom of association and collective bargaining was only restricted under law, the employer facilitates.
- According to workers interview, they were free to join worker committee on their own choice, the factory management recognized and respected their rights to freedom of association and collective bargaining, and the workers were not subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.

Evidence examined:

1. Management interview
 2. Worker interview
 3. Records from the worker committee
 4. Suggestions from the suggestion box and actions taken
-

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? Yes

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? Yes

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	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The factory established a policy and procedure on health and safety. Based on site verification (including on site observation, document review, management and workers interview), the factory was well ventilated. The factory maintained a comfortable temperature throughout work floors. Sufficient fire safety equipment was provided in workshops. Drinkable water was available freely in workshops. Fire drill records were provided for review. First aid kit with sufficient supply was provided in workshop. Training and communication of policy and procedures were provided to all relevant employees, but oversights or gaps in how training programs were managed leading to NCs, the facility didn't effectively monitored these procedures. The management system needed to be improved to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC ZAF600699525
	3.N Maintain a log of all hazardous substance...	§2	NC ZAF600699526
	3.N Maintain a log of all hazardous substance...	§3	NC ZAF600699527
	3.H Where identified as necessary to reduce r...	§4	NC ZAF600699528
	3.M Ensure all machinery is installed, mainta...	§5	NC ZAF600699529
	3.O Implement an appropriate electrical safet...	§6	NC ZAF600699530
	3.O Implement an appropriate electrical safet...	§7	NC ZAF600699531
	3.O Implement an appropriate electrical safet...	§8	NC ZAF600699532
	3.B Conduct risk assessments regarding the po...	§9	NC ZAF600699533

Systems and evidence examined to validate this code section

Current systems:

- The factory was well ventilated.
- The factory maintained a comfortable temperature throughout work floors.
- Sufficient fire safety equipment was provided in workshops.
- Drinkable water was available freely in workshops.
- Fire drill records were provided for review. Fire drill dates in current audit period were October 16, 2023 and March 8, 2024.
- First aid kit with sufficient supply was provided in workshop.
- Legal construction safety document was provided for review and 3rd party structural engineer evaluation was not provided, and it was not required by local law.

Evidence examined:

1. Factory tour
 2. Document review (H&S policies and procedures, fire drill records, etc.,)
 3. Worker interview
 4. Management interview
-

Findings: non-compliances

ZAF600699525

Non-compliance

Due 2025-01-14

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

60 days

Issue title

230 - No material safety data sheet (MSDS) obtained/available

Verification method

Desktop audit

Description

It was noted that no material safety data sheet for products (MSDS) was available for paint being used in the paint spraying workshop. 审核发现工厂喷涂车间使用的油漆没有放置化学品安全技术说明书(MSDS)。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all chemicals being used in the factory have complete material safety data sheet for products (MSDS) which are also provided to the relevant employees handling chemicals in the factory. 建议所有在工厂使用的化学品都具备完整的化学品安全技术说明书(MSDS), 并提供给工厂内使用化学品的相关员工。

Local law reference

In accordance with Article 27 of the Regulation For Chemical Usage Safety in Work Place: Staff and workers are entitled to receive: (1) Date and information in description of the specific characteristics, hazardous ingredients, and safety precaution marks of the chemicals to be used in the working premises, and instructions upon safety techniques, etc. (2) Information concerning the probability of occurrence of harm against safety and health of staff and workers caused by hazardous chemicals in the working process. (3) Trainings upon safety techniques, including trainings with regard to prevention and control, and danger-avoiding methods, handling of emergency cases, or emergency measures. (4) Labor protection articles in conformity to State stipulations.

根据《工作场所安全使用化学品规定》第27条：职工有权获得：(1)工作场所使用化学品的特性、有害成分、安全标签以及安全技术说明书等资料；(2)在其工作过程中危险化学品可能导致危害安全与健康的资料；(3)安全技术的培训，包括预防、控制、及防止危险方法的培训和紧急情况处理或应急措施的培训；(4)符合国家规定的劳动防护用品。

Evidence



202411.07 14:32

[NC No posted MSDS.jpg](#)



* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699526

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)

Verification method

Desktop audit

Description

It was noted that there was no anti-leakage facility (e.g. secondary container) in the paint spraying for 40% paint containers (Hazardous chemical). 审核发现工厂喷涂车间40%的油漆(危险化学品)没有设置防渗漏设施/二次容器。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that anti-leakage facilities (e.g. secondary containers) are used for hazardous chemicals. 建议工厂为存放在工厂内的危险化学品设置防渗漏设施/二次容器。

Local law reference

In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antiseptis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.

根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。

Evidence



2024.11.07 14:32

[NC No secondary container.jpg](#)



* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699527

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

233 - Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

Verification method

Desktop audit

Description

It was noted that all paint containers stored in the paint spraying workshop were not posted with safety labels.

审核发现工厂喷涂车间存放的油漆没有张贴安全标签。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all hazardous chemicals stored or being used in the factory is posted with safety labels. 建议所有在工厂内储存和使用的危险化学品都有张贴安全标签, 标签的内容要完整。

Local law reference

In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed. 根据《工作场所安全使用化学品规定》第14条: (1)使用单位购进的化学品需要转移或分装到其他容器时, 应标明其内容。对于危险化学品, 在转移或分装后的容器上应贴安全标签; (2)盛装危险化学品的容器在未净化处理前, 不得更换原安全标签。

Evidence



[NC No safety label.jpg](#)



* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699528

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Time given to resolve

30 days

Issue title

278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Verification method

Desktop audit

Description

It was noted that 2 out of 14 polishing employees working in the polishing workshop wore disposable masks rather than anti-dust gloves provided by the factory.
审核发现工厂机砂车间的2/14名打磨的员工佩戴的是普通一次性口罩而不是工厂提供的防尘口罩。

Area of non-compliance/non-conformance

Local law
Base code

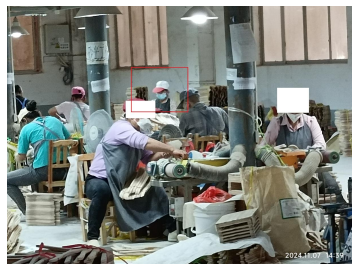
Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that necessary personal protective equipment are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately. 建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。

Local law reference

In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use. 根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。

Evidence



[NC Employee wore wrong type mask.jpg](#)

* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699529

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

It was noted that the transmission belts of 2 out of 3 drilling machines in the drilling area were not equipped with pulley guards. 审核发现钻孔区域2/3台钻孔机没有安装皮带轮防护罩。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all drilling machines are equipped with pulley guards. 建议工厂为所有的钻孔机安装皮带保护罩。

Local law reference

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.
Article 6.3 of Code of Design of Manufacturing Equipment Safety and Hygiene, for supercooling and overheating, if the hot or supercooled parts of the production equipment may cause danger, they must be equipped with anti-contact shielding.
根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。
根据《生产设备安全卫生设计总则(GB5083-1999)》第6.3 过冷与过热，若生产设备的灼热或过冷部位可能造成危险，则必须配置防接触屏蔽。

Evidence



[NC No pulley guard.jpg](#)



* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699530

Non-compliance

Due 2025-01-14

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

60 days

Issue title

224 - Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

Verification method

Desktop audit

Description

It was noted that 1 out of 3 electricity switch boxes in the cutting area were exposed without insulation protective device. 审核发现工厂开料区1/3个电开关箱没有足够的保护装置。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all electricity switch boxes are properly insulated to avoid hazard of electrical shock. 建议工厂对工厂内的电开关箱安装足够的保护装置，防止电线裸露。

Local law reference

In accordance with Article 5.1.2 of the General Guide for Safety of Electric User (GB/T13869-2017), electric circuit in use must have sufficient insulation strength, mechanical strength and conductive capability and the installation of which should meet the standards for corresponding electrical devices. 根据《用电安全导则GB/T13869-2017》第5.1.2条：用电产品的电气线路须具有足够的绝缘强度、机械强度和导电能力，其安装应符合相应产品标准的规定。

Evidence



[NC No insulation protective device.jpg](#)

* PDF generated at 07:09 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600699531

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

226 - Blocked access to electricity panels

Verification method

Desktop audit

Description

It was noted that 30% electricity boxes in the factory were blocked by production materials. 审核发现工厂内30%的电箱被生产物料阻挡了。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all electricity boxes in factory are free of obstruction. 建议工厂确保工厂内所有电箱都不被阻挡，应留有足够的安全通道和工作空间。

Local law reference

In accordance with Article 5.1.1 of the General Guide for Safety of Electric User (GB/T13869-2017), there shall be sufficient safety path and operation space around the electric installation. No flammable, explosive or corrosive material shall be stored near the electric installation. 根据《用电安全导则GB/T13869-2017》第5.1.1条：一般条件下，用电产品的周围应留有足够的安全通道和工作空间，且不应堆放易燃、易爆和腐蚀性物品。

Evidence



[NC Blocked electricity box.jpg](#)



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ZAF600699532

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

30 days

Issue title

227 - Unmarked/incorrect labels/signage/instructions for electrics

Verification method

Desktop audit

Description

It was noted that no warning sign was marked on 20% electricity switch boxes in the factory. 审核发现工厂内20%的电开关箱未张贴用电警示标志。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that all electricity boxes in the factory are marked to avoid electric shock. 建议工厂对整个工厂的电箱安装警示标志。

Local law reference

In accordance with Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, the electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen.

6.2 The material of signs: Safety signs should be made of durable material. The materials which will be deformed or deteriorated when wet and flammable material are generally shall preferably not be used. The insulation material should be used at workplace where there is risk of electric shock. 根据《安全标志及使用导则(GB 2894-2008)》警示标志2-7, 当心触电警示标志应安装在有可能发生触点危险的电器设备和线路, 如: 配电室、开关等。

6.2 标志牌的材质: 安全标志牌应采用坚固耐用的材料制作, 一般不宜使用遇水变形、变质或易燃的材料。有触电危险的作业场所应使用绝缘材料。

Evidence



[NC No warning sign.jpg](#)



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ZAF600699533

Non-compliance

Due 2024-12-15

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.B Conduct risk assessments regarding the potential hazards arising from work. The risk assessment shall be reviewed whenever processes change and at least annually considering any incidents and findings.

Time given to resolve

30 days

Issue title

151 - No health and safety risk assessment conducted

Verification method

Desktop audit

Description

It was noted that paint was used in paint spraying workshop, polishing, flocking and cutting employees were exposed to noise and dust, which might cause occupational diseases to employees in these workshops. However, the factory did not conduct testing of factors of occupational hazards in recent year. 审核发现工厂喷涂车间使用油墨，打磨，植绒和开料车间员工接触了噪声和粉尘，对员工存在潜在的职业病危害。但工厂最近一年并未对车间进行职业危害因素检测。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure to entrust an occupational health technical service institution with the corresponding qualification to conduct testing of factors of occupational hazards at least once a year. 建议工厂委托有资质的职业卫生技术服务机构至少每年检测一次职业病危害因素。

Local law reference

In accordance with Article 20 of Provisions on the Administration of Occupational Health at Workplaces, the employer with serious occupational hazards shall entrust an occupational health technical service institution with corresponding qualification to carry out the detection of occupational hazards at least once a year and the assessment of the current situation of occupational hazards at least once every three years.

The employer with general occupational hazards shall entrust an occupational health technical service institution with corresponding qualification to carry out the detection of occupational hazards at least once every three years. 根据《工作场所职业卫生管理规定》第20条 职业病危害严重的用人单位，应当委托具有相应资质的职业卫生技术服务机构，每年至少进行一次职业病危害因素检测，每三年至少进行一次职业病危害现状评价。 职业病危害一般的用人单位，应当委托具有相应资质的职业卫生技术服务机构，每三年至少进行一次职业病危害因素检测。

Evidence



[Photo evidence is not applicable.pdf](#)



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3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
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?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No structural additions were noted.
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
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory establishes a policy that will never employ and use any child labor under the age of 16 years old. The factory will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. Sufficient numbers of employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth. The employees between 16 to 18 years old would be registered to the Department of labor. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

1. The factory establishes a policy that will never employ and use any child labor under the age of 16 years old.
2. The factory will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files.
3. Sufficient numbers of employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth.
4. The employees between 16 to 18 years old would be registered to the Department of labor.

Evidence examined:

1. Policy review
 2. Document review (Hiring policy, personnel files, etc.,)
 3. Management interview
 4. Worker interview
-

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	1%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	19
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
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

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The factory established a policy and procedure on workers' wages and benefits. Per payroll registers and employees & management interview, all employees were paid by hourly rate, and all employees were paid by cash before the 10th of next month. Parts of employees were provided with 5 kinds of social insurance benefit in the factory. Training and communication of policy and procedures were provided to all relevant employees, but oversights or gaps in how training programs were managed leading to NCs, the facility didn't effectively monitored these procedures. The management system needed to be improved to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600699535

Systems and evidence examined to validate this code section

Current systems:

- The auditor reviewed the payroll records of 30 samples from February 2024, August 2024 and October 2024.
- Per payroll registers and employees & management interview, all employees were paid by hourly rate, and all employees were paid by cash before the 10th of next month.
- All sampled workers were paid at least RMB 12.36 per hour during 3 tested months, which above the local minimum wage standard of RMB 9.72 per hour since November 2023.
- Parts of employees were provided with 5 kinds of social insurance benefit in the factory.
- The factory used a fingerprinting system for time keeping.
- Employees were provided with pay slip monthly.

Evidence examined:

Wage and compensation policy review
Payroll and social insurance records review
Employee interview

Findings: non-compliances

ZAF600699535

Non-compliance

Due 2025-01-14

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt provided by factory management, it was noted that only 6 out of 96 employees were provided with pension, unemployment, accident, medical and maternity insurance in October 2024. Besides, the factory provided commercial insurances for 96 employees with a valid period from February 19, 2024 to February 18, 2025.
 审核员发现工厂的社会保险覆盖不足。根据厂方提供的2024年10月的社会保险缴费单据显示工厂为6/96名员工提供了养老、失业、工伤、医疗和生育保险。另外，工厂为96名员工购买了商业保险，有效期为2024年2月19日至2025年2月18日。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements. 建议工厂为员工提供所有法定的社会保险福利。

Local law reference

In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.
 The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.

In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium.

根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：(一)退休；(二)患病、负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。

根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。

Evidence



[NC Insufficient social insurance coverage.jpg](#)



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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

Worker remuneration

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

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Not available	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	Non applicable
Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0

Actual overtime hours	Max hours per day	2.0
	Max hours per week	18.0
	Max hours per month	84.0
Minimum legal wage	Min per hour	9.72
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	1690.0
Actual minimum wage	Actual per hour	12.36
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable
Minimum legal overtime wage	Min per hour	14.58
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	18.54
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 samples from February 2024, 10 samples from August 2024, and 10 samples from October 2024.
Are there different legal minimum/ legally recognised CBAs wage grades?	No

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

Above legal minimum

Indicate the breakdown of workforce per earnings

0% of workforce earning under minimum wage
0% of workforce earning minimum wage
100% of workforce earning above minimum wage

Are there any bonus schemes used?

Yes

Work post allowance.

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ul style="list-style-type: none"> - The auditor reviewed the payroll records of 30 samples from February 2024, August 2024 and October 2024. - Per payroll registers and employees & management interview, all employees were paid by hourly rate, and all employees were paid by cash before the 10th of next month. - All sampled workers were paid at least RMB 12.36 per hour during 3 tested months, which above the local minimum wage standard of RMB 9.72 per hour since November 2023. - Parts of employees were provided with 5 kinds of social insurance benefit in the factory. - The factory used a fingerprinting system for time keeping. - Employees were provided with pay slip monthly. - No living wage was required by legal requirement, the factory did not calculate living wage for employees. <p>Evidence examined:</p> <ul style="list-style-type: none"> Wage and compensation policy review Payroll and social insurance records review Employee interview 		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	The factory established a policy and procedure regarding working hours. A review of 30 sample population employees' time records (10 samples from February 2024, August 2024 and October 2024 respectively). It was noted that the maximum overtime worked on weekdays was 2 hours, the maximum weekly working hours were 58 hours. The maximum monthly overtime hours were 84 hours among testing period and the longest consecutive working day were 6 days. Training and communication of policy and procedures were provided to all relevant employees, but oversights or gaps in how training programs were managed leading to NCs, the facility didn't effectively monitored these procedures. The management system needed to be improved to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC ZAF600699534

Systems and evidence examined to validate this code section

Current systems:

- A review of 30 sample population employees' time records (10 samples from February 2024, August 2024 and October 2024 respectively). It was noted that the maximum overtime worked on weekdays was 2 hours, the maximum weekly working hours were 58 hours. The maximum monthly overtime hours were 84 hours among testing period and the longest consecutive working day were 6 days.
- The factory used a fingerprinting system for time keeping, time records for the past 12 months were retained for review.

Evidence examined:

1. Working hours policy and procedure
 2. Time Records
 3. Employee interview
 4. Management interview
-

Findings: non-compliances

ZAF600699534

Non-compliance

Due 2025-01-14

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

60 days

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Verification method

Follow up audit

Description

It was noted that 30 out of 30 sample population employees worked in excess of the statutory overtime hour limits. A review of 30 sample population employees' time records (10 samples from February 2024, 10 samples from August 2024 and 10 samples from current paid month October 2024) yielded the following:

(1) 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 38 hours) in February 2024 which was not in compliance with the legal requirement.

(2) 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 84 hours) in August 2024 which was not in compliance with the legal requirement.

(3) 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 72 hours) in October 2024, which was not in compliance with the legal requirement.

根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。审核员从厂方提供的工资记录中抽取30个样本(其中从2024年2月抽取10个，从2024年8月抽取10个，从最近工资发放月份2024年10月抽取10个)，发现共有30名员工加班时间超出了法定标准，具体为：

(1) 10/10名员工在2024年2月的加班时间为38小时，超过每月加班时间不能超过36小时的法律规定；

(2) 10/10名员工在2024年8月的加班时间为84小时，超过每月加班时间不能超过36小时的法律规定；

(3) 10/10名员工在2024年10月的加班时间为72小时，超过每月加班时间不能超过36小时的法律规定。

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。

Local law reference

In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。

Evidence

The screenshot shows a list of dates and times, possibly representing an audit schedule or findings. The text is partially obscured but appears to be a list of dates in YYYY-MM-DD format, followed by times in HH:MM:SS format. The dates range from 2024-06-01 to 2024-11-01. The times are mostly in the afternoon and evening, ranging from 13:00 to 19:00. The list is organized in a grid-like structure with columns for dates and times.

[NC overtime exceed law limit.jpg](#)



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6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A, The factory paid overtime wage 150%, 200% and 300% of normal wage for overtime worked on weekdays, rest days and holidays.
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?	58.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	58.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on discrimination. As informed by interviewed workers, most employees spoke highly of the factory owner. No worker was required to do the examination of the hepatitis B virus and HIV. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit. Gender divisions did not exist in the factory, both female and male workers were distributed in all types of work. There was no evidence of sexual harassment. There was no evidence of sexual discrimination. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- As informed by interviewed workers, most employees spoke highly of the factory owner.
- No worker was required to do the examination of the hepatitis B virus and HIV.
- Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
- Gender divisions did not exist in the factory; both female and male workers were distributed in all types of work.
- There was no evidence of sexual harassment.
- There was no evidence of sexual discrimination.

Evidence examined:

- The hiring and termination procedure, leave application records and employee handbook.
 - Payroll records
 - Attendance records
 - Termination records
 - Training records
-

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)?	7%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	All managerial and supervisory roles were Chinese nationalities.

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on recruitment. Based on site verification (including on-site observation, document review, management and workers interview), workers were provided with employment contract upon recruitment. The employment contract items were in compliance with legal requirement. A copy of employment contract was provided to each employee. Work performed is on the basis of recognized employment relationship established through national law and practice. The factory signs labor contracts with employees within 30 days after employment. There is no homeworking from the site. No agency worker in the factory. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- Workers were provided with employment contract upon recruitment.
- The employment contract items were in compliance with legal requirement.
- A copy of employment contract was provided to each employee.
- Work performed is on the basis of recognized employment relationship established through national law and practice.
- The factory signs labor contracts with employees within 30 days after employment.
- There is no homeworking from the site.
- No agency worker in the factory.

Evidence examined:

Document review (i.e. factory policy and labour contract)
Worker interview
Management interview

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
--	--------

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
---	------

Percentage of workers employed as apprentices, trainees or interns	0.0%
--	------

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on sub-contracting and homeworkers. Per factory tour, it was noted that the production processes in the factory were complete and this was also verified through production processes overview provided by factory. Auditor also checked material in-and-out records, no subcontracting or homeworking was noted. Management confirmed that they would not use any subcontractor unless agreed by their client. Per factory tour, employee interview and document review, it was also noted that all productions were onsite, no homeworking was noted. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

1. Per factory tour, it was noted that the production processes in the factory were complete and this was also verified through production processes overview provided by factory.
2. Auditor also checked material in-and-out records, no subcontracting or homeworking was noted.
3. Management confirmed that they would not use any subcontractor unless agreed by their client.
4. Per factory tour, employee interview and document review, it was also noted that all productions were onsite, no homeworking was noted.

Evidence examined:

- Factory Tour
 - Management interview
 - Worker interview
 - Materials in/out records
-

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

Data points

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

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

Per factory tour, employee interview and document review, the factory didn't buy products or services from suppliers that use homeworkers.

Sub-contracting

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

No

Per factory tour, it was noted that the production processes in the factory were complete and this was also verified through production processes overview provided by factory.

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
Explanation for management systems grades	According to the documentation, the factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure. As per management interview, document review and workers interview, there was a policy on No-Harsh Treatment. There is an internal process for grievance, where workers can report any grievances (harassment, bullying, discrimination etc.); any received complaint will be handled by management, without any reprisal for the worker in question. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- According to the documentation, the factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed training program for all employees on the procedure.
- Worker interview confirmed that workers were aware of the disciplinary procedure.
- As per management interview, document review and workers interview, there was a policy on No-Harsh Treatment.
- There is an internal process for grievance, where workers can report any grievances (harassment, bullying, discrimination etc.); any received complaint will be handled by management, without any reprisal for the worker in question.

Evidence examined:

- The relevant policy on prevention of harassment and abuse
 - Internal grievance procedure documentation.
 - Training records
-

9. No harsh or inhumane treatment is allowed

Data points

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

What type of grievance mechanism(s) are available? Suggestion box and worker representatives.

Number of grievances raised in the last 12 months 0

Number of grievances resolved in the last 12 months 0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on the environment. Responsible person was assigned for environment issue management. The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations. All of the legally required certificates including the registration form of environmental impacts of the construction, Approval of environmental impact assessment document were available and valid during this audit. The annual monitoring report for waste air and water showed the pollutant discharging was compliant with environmental law. Based on observation on site, wastes were classified and collected on site. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- Responsible person was assigned for environment issue management.
- The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations.
- All of the legally required certificates including the registration form of environmental impacts of the construction, Approval of environmental impact assessment document were available and valid during this audit.
- The annual monitoring report for waste air and water showed the pollutant discharging was compliant with environmental law.
- Based on observation on site, wastes were classified and collected on site.

Evidence examined:

1. Factory tour
 2. Production processes charts, environment policy, environmental impacts report and certificate, waste dispose contract
 3. Management interview
-

10.A. Environment 2-Pillar

Data points

<p>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)?</p>	<p>No</p>
<p>Does the site have any valid environmental or energy management certificates?</p>	<p>Not applicable. The facility didn't have any valid environmental or energy management certificate.</p>
<p>Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?</p>	<p>No</p>
<p>Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?</p>	<p>Yes The risk assessment on the environmental impact and climate change was conducted in factory.</p>

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ul style="list-style-type: none"> - The factory established the environment policy and procedure to ensure meeting applicable environmental laws. - All of the necessary documentation on environmental protection was obtained. - The factory had tracked necessary data (energy, water, waste, etc.). <p>Evidence examined:</p> <ul style="list-style-type: none"> - Factory tour - Environment policy and procedure review - Environment tracked necessary data (energy, water, waste, etc.) review - Legally required environmental protection permits documents review - Worker interview - Management interview 		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?

Yes

What additional specific environmental policies does the site capture?

Packaging optimization

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?

Not Applicable

Does the site have reduction targets in place to manage climate related risks?

None

Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?

No

Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?

Not Applicable

Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	2,171,946	1,371,606
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	Data not available	Data not available

Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	56,827	54,792
Water discharged	Sewage pipe	Sewage pipe
Water volume discharged (m3)	56,827	54,792
Water volume recycled (m3)	0	0
Total waste produced (mt)	9.4	9.4
Total hazardous waste produced (mt)	0.6	0.7
Waste to recycling (mt)	8	7.9
Waste to landfill (mt)	0.8	0.8
Waste to other (mt)	0	0
Total product produced (mt)	500	400

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established a policy and procedure on business ethics. Responsible person was assigned for environment issue management. Based on site verification (including on site observation, document review, management and workers interview), no unethical case happened in the factory during the past. There was an internal grievance process including anonymous contact telephone for reporting any unethical case. Effective training and communication of policy and procedures were provided to all relevant employees. The facility effectively monitored procedures Systems were in place to ensure the management structure and responsibilities were reactive to changing circumstances.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- The company manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- The company established a business ethics policy which was communicated to workers through posters and training.
- The site had received and read the Business Ethics policy of the auditor/audit company.
- There was an internal grievance process, which was an anonymous email address

Evidence examined:

The company business ethics policy including

- Bribery
- Corruption

Training records

Worker handbook

Reports from Anonymous email account

10.C. Business ethics

Data points

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

No

Provide any certified anti-bribery management systems for the site

NA. No certified anti-bribery Management Systems for the site.

Attachments



[Flocking.jpg](#)



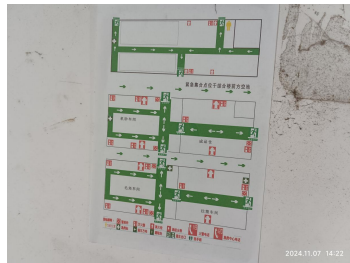
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