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Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
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Expiration Date 28/03/2026	Announcement Type Semi Announced	
Site xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd.	Site amfori ID 156-034725-001	

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	A	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	B	
PA 6: Decent Working Hours	D	













## FINDINGS

### PA1: Social Management System

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**Question:** 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially respects this principle. According to document review, onsite observation, management and employee interview, the factory had established management procedures to implement the amfori BSCI COC, but not all the procedures had been implemented systematically. Such as insufficient decent living wage, insufficient social insurance, excessive overtime and inadequate EHS management. The management stated that the operation on social responsibility was mainly based on past experiences, they knew the gaps between the requirements of amfori BSCI COC and their performance, but it was difficult to implement these procedures effectively in practical work due to limited manpower and cost budget. (It violated the requirement of amfori BSCI system manual)	工厂部分遵循该准则。根据文件审阅、现场观察、管理层和员工访谈，工厂建立了管理程序来实施 amfori BSCI 行为准则，但不是所有程序都有效实施。例如不足的体面生活工资、社保不足、加班超时以及不足的环境健康安全。管理层表示工厂社会责任的运作主要通过以往经验学习，他们清楚 amfori BSCI 行为准则的要求与他们目前表现的差距，但是由于有限的人力和成本预算，在实际工作中难以有效实施这些程序。（违反了 amfori BSCI 系统手册中的要求）

**Question:** 1.4 Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially respects this principle. According to document review, management and employee interview, the factory did not properly organize its workforce to meet the expectations of the delivery order and contracts, workers' overtime hours exceeded legal requirement. The management stated that they understood the production rate and date of delivery, but they had to arrange some overtime to finish production order on time. (It violated the requirement of amfori BSCI system manual)	工厂部分遵循该准则。根据文件审阅、管理层和员工访谈，工厂未有效组织其劳工来达成交付订单和合同的预期，员工加班时间超过法规要求。管理层表示他们清楚了解工厂生产效率和交货期，但是他们必须安排一些加班来准时完成订单。（违反了 amfori BSCI 系统手册中的要求）

### PA 2: Workers Involvement and Protection

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**Question:** 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>The factory partially respects this principle.</p> <p>According to document review, management and employee interview, insufficient social insurance participated. There were 35 employees in the factory, 13 employees were retirees hired to work again, no new employee was hired after the social insurance application of February 2025, so the factory should provide social insurance for 22 employees. The factory provided social insurance receipts and name lists from March 2024 to February 2025 for review, it was noted that 11 out of 22 employees were not provided with retirement insurance, unemployment insurance, medical insurance, child-bearing insurance and work-related injury insurance in February 2025. The management explained that the reason for insufficient social insurance coverage rate was the unwillingness of employees, the employees who did not have social insurance stated that they did not want to buy social insurance because they had participated in new-pattern rural insurance at home, the related new-pattern rural insurance records were not available for check during audit day. (Reference law: Social Insurance Law of the People's Republic of China, Article 10, 23, 33, 44, 53)</p> <p>Remark: the factory provided group commercial accident injury insurance for 26 employees (including the 11 employees who did not have work-related injury insurance and 13 retirees hired to work again) during the period from 20 April 2024 to 19 April 2025.</p>	<p>工厂部分遵循该准则。根据文件审阅、管理层和员工访谈，社会保险参保不足。工厂有35名员工，13名为退休返聘员工，2025年2月份社保申报后没有新入职员工，因此工厂应该为22名员工提供社会保险。工厂提供了2024年3月至2025年2月的社保凭证和参保名单供审核，在2025年2月，工厂未给22名员工中的11名提供养老、失业、医疗、生育和工伤保险。管理层解释到社保不足的原因是员工不愿意购买社保，没有社保的员工表示他们不想参加社保，因为他们在老家参加了新农保，相关的新农保记录在审核天未提供查看。（参考法律法规：《中华人民共和国社会保险法》第10，23，33，44，53条）</p> <p>备注：工厂给26名员工（包括了11名没有工伤保险的员工和13名退休返聘员工）提供了有效期从2024年4月20日至2025年4月19日的团体商业意外工伤保险。</p>

## PA 6: Decent Working Hours

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**Question:** 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>The factory does not respect this principle.</p>	<p>工厂未遵循该准则。根据文件审阅、管理层和员工</p>

Finding	
<p>According to document review, management and employee interview, overtime hours exceeded the legal requirement, the factory did not have effective overtime control system. The management stated that the overtime schedule was arranged by orders, orders needed shipment in time, so workers needed to work overtime. The interviewed workers stated that overtime work was voluntary and they could earn more money by working overtime. Based on the attendance records from 1 February 2024 to 24 March 2025, the maximum daily OT were 2 hours, workers' monthly overtime hours exceeded 36 hours in each month from March 2024 to December 2024. Details of the sampled months as below:</p> <p>May 2024: 8 out of 8 sampled workers' monthly OT exceeded 36 hours and were 56 hours;</p> <p>September 2024: 8 out of 8 sampled workers' monthly OT exceeded 36 hours and were 54 hours;</p> <p>December 2024: 8 out of 8 sampled workers' monthly OT exceeded 36 hours and were 54 hours. (Reference Law: PRC Labour Law article 41).</p> <p>Remark: the maximum monthly overtime hours of January 2025 were 32 hours, the maximum monthly overtime hours of February 2025 were 30 hours, the maximum monthly overtime hours from 1 March 2025 to 23 March 2025 were 32 hours, due to workers were on vacation during Spring Festival in January 2025 and February 2025, so the attendance records of January 2025 were not selected as samples.</p>	<p>访谈，加班时间超过法规要求，工厂没有有效的系统去控制加班。管理层表示加班根据订单安排，订单需要及时出货，因此需要加班工作。访谈的员工表示加班是自愿的，且加班可以增加收入。根据2024年2月1日至2025年3月24日的考勤记录发现，最大的日加班为2小时，从2024年3月至2024年12月的每个月，员工的月加班都超过36小时。抽样月份的情况如下：</p> <p>2024年5月：8名抽样员工中的8名的月加班超36小时，为56小时；</p> <p>2024年9月：8名抽样员工中的8名的月加班超36小时，为54小时；</p> <p>2024年12月：8名抽样员工中的8名的月加班超36小时，为54小时。（参考法律法规：《中华人民共和国劳动法》第41条）</p> <p>备注：2025年1月的最大月加班时间是32小时，2025年2月的最大月加班时间是30小时，2025年3月1日至2025年3月23日的最大月加班时间是32小时，由于员工在2025年1、2月春节休假，因此2025年1月的工作时间未选取作为抽样。</p>

## PA 7: Occupational Health and Safety

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Question: 7.17 Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?	
ENGLISH	LOCAL LANGUAGE
Finding	
<p>The factory partially respects this principle. According to document review, onsite observation and management interview, the factory established the procedure on equipment management and appointed the person to maintain, but the equipment management system needed improve: there were 8 charging ladders in the injection</p>	<p>工厂部分遵循该准则。根据文件审阅、现场查看和管理层访谈，工厂建立了设备管理制度和任命人员去维护保养，但设备管理上还需要提升：注塑车间有8台加料梯，梯子的高度超过1.4米，但8台梯子中的2台没有安装扶手和护栏。注塑员工表示过去一年没有发生过坠落或工伤。管理层表示他们还没来得及维修这2台梯子。（参考法律法规：《机械安全进</p>

<p>molding workshop, which was more than 1.4 meters, but no handrail and guardrail was installed for 2 out of 8 ladders. The injection molding workers stated that no falling or injury occurred in the past year. The management stated that it hadn't had enough time to repair the 2 ladders.</p> <p>(Reference law: Safety of machinery - Permanent means of access to machines and industrial plants - Part 3: Stairways, stepladders and guard – rails GB17888.3 -2008, Article 7)</p>	<p>入机器和工业设备的固定设施，第三部分：楼梯、阶梯和护栏》GB17888.3 -2008，第7条）</p>
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[illegible]

ENGLISH	LOCAL LANGUAGE
<p><b>Finding</b></p> <p>The factory partially respects this principle. According to document review and management interview, the factory had not obtained the environmental protection acceptance check report of their completed construction project. The management stated that they would build new buildings later, so they did not apply for it. (Reference law: Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project article 17)</p>	<p>工厂部分遵循该准则。根据文件审阅和管理层访谈，工厂没有取得建设项目竣工环境保护验收报告。管理层表示后面会修建新厂房所以没有去办理。（参考法律法规：《建设项目竣工环境保护验收管理办法》第17条）</p>

ENGLISH	LOCAL LANGUAGE
<p><b>Finding</b></p> <p>The factory partially respects this principle. According to document review, onsite observation and management interview, the factory had established environmental procedures, but did not effectively improve environment sustainability: the factory didn't conduct the boundary noise monitoring, boundary noise was generated from injection molding process; the factory also didn't conduct the waste air monitoring, waste air was</p>	<p>工厂部分遵循该准则。根据文件审阅、现场查看和管理层访谈，工厂建立了环保程序，但是未有效地改善环境绩效：工厂未进行厂界噪音监测，厂界噪音由注塑工序产生；工厂也未进行废气监测，注塑工序产生废气，注塑工序的废气无组织排放。管理层表示没有做是出于成本控制考虑。（参考法律法规：《排污单位自行监测技术指南（HJ819-2017）》第5.2条和第5.4条）</p>

Finding	
generated from injection molding process, the waste air from injection molding process was emitted in an unorganized manner. The management claimed that they did not conduct it as consideration of cost control. (Reference law: Self-monitoring technology guidelines for pollution units (HJ 819-2017), Article 5.2 and Article 5.4)	

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