

Monitored Party xxxxxxxxxxxxxxxxxxxxxx xxxxxx	amfori ID 156-005616-000	Address xxxxxxxxxxxxxxxxxxxxxx China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Follow-up Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 20/03/2025	Closing Meeting Finished Date 21/03/2025	Submission Date 27/03/2025
Expiration Date 01/04/2026	Announcement Type Semi Announced	
Site xxxxxxxxxxxxxxxxxxxxxx xxxxxx	Site amfori ID 156-005616-002	

This is an extract of the online Monitoring Result, generated on 27/03/2025, and is only valid as an acknowledgement of the result. To see all the details, review the full monitoring result, which is available on the [amfori Sustainability Platform](#) - The English version is the legally binding one.

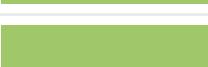
amfori does not assume any liability with regard to the compliance of this extract, or any versions of this extract, with the Regulation (EU) 2016/679 (General Data Protection Regulation).

All rights reserved. No part of this publication may be reproduced, translated, stored in a retrieval system, or transmitted, in any form or by any means electronic, mechanical, photocopying, recording or otherwise, be lent, re-sold, hired out or otherwise circulated without the amfori consent. © amfori, 2021

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	A	

PA 6: Decent Working Hours	D	
PA 7: Occupational Health and Safety	A	
PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Nina Zheng; Registration number: CSCA 21701910.

Monitoring partner name: TUV Rheinland

Audit schedule details: The audit was planned for 1 auditor x 1.5 days.

Announcement Type: Semi-Announced.

This was a follow-up audit and PA 1, 2, 5, 6, 7, 13 had been audited (No finding of PA5 in last audit, but for crossing checking PA6). The rate and evidence of PA not audited kept same as last audit.

Business partner information: The auditee was founded in 2015, which was located at xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx China (中国xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx).

The main product manufactured by the factory was Lock. The main production processes were Injection and die-casting, mold processing, Metal stamping, polishing and cleaning, Painting and pad printing, Assembly and packing. The electroplating process was subcontracted to outsource.

Audited location information: In the factory zone no other factories were available, and all buildings were owned by the factory. The factory occupied total 8 buildings: one 3-storey office building A, one 3-storey warehouse and production building B, one 1-storey production building C, three 3-storey buildings of D,E,F, two 6-storey dormitory buildings of G,H. There was total 61851 square meters. The factory did not share buildings with other factories. In the building A: 1F-3F was office. In the building B: 1F was office, finished products warehouse, molding making workshop, raw material warehouse; 2F was office, finished products warehouse; 3F was office, raw material warehouse. In the building C: die casting, hardware processing workshop. In the building D: 1F was molding workshop; 2F and 3F was assembly, packing workshop, warehouse. In the building E: 1F was warehouse; 2F was office, warehouse; 3F was warehouse. In the building F: 1F was injection workshop; 2F was assembly and packing workshop; 3F was printing and pad printing workshop. In the building G: 1F was canteen and kitchen, 2F-6F was living room. In the building H: 1F was canteen and kitchen, 2F-6F was living room.

No transportation was provided by this auditee.

Operating shifts and hours: Working hour records were provided by the auditee from 01 Mar. 2024 to the audit date (21 Mar. 2025), last audit was conducted on 26-27 Mar. 2024. The working hours arranged for office employees and production worker (except injection and die casting workers) was 08:00-12:00, 13:30-17:30. There were two shifts arranged for injection and die casting workers, day shift: 08:00-12:00, 13:00-17:00, and 18:00-20:00 as overtime, night shift: 20:00-24:00, 01:00-05:00, and 06:00-08:00 as overtime. There were three shifts arranged for security guards: 07:30-15:30, 15:30-23:30, 23:30-07:30. The working hours arranged for kitchen staff was 06:30-09:30, 11:00-14:00 and 16:00-18:00. Working hour records from 15 sampled workers showed that the maximum daily overtime was 2 hours, the maximum weekly overtime hours was 18 hours, and maximum monthly overtime was 84 hours. The maximum consecutive working days was 6 days.

Time recording system: The auditee used face recognition system attendance machine to record working hours.

Salary payment details: The auditee established wage and benefits rule. The wages of current month were paid to workers by bank before 20th day of next month. During this audit the factory provided payroll records from Mar. 2024 to Feb. 2025 for review. All workers were paid by hourly rate. At least RMB13.22 per hour (RMB2300 per month) was paid for workers as basic wage, which was higher than the legal requirement (RMB1900 per month since 1 Dec. 2021, RMB2080 per month since 1 Mar. 2025). 150%, 200% and 300% of regular wage were paid to OT working on regular day, rest day and holiday, with position allowance per month. Annual leave and statutory holiday, etc. was provided to workers, and no money was deducted except the social insurance. The factory provided the social insurance for all workers (Special injury insurance for retired workers).

Worker number information: There was total 1138 employees in the factory (557 male and 581 female), including 225 non-production staffs (126 male and 99 female), 913 production workers (431 male and 482 female). There were 975 domestic migrant employees (483 male and 492 female), 175 night working employees (117 male and 58 female), no other foreign migrant, young, pregnant, seasonal, temporary, disabled, home-based, interns, apprentices' workers were found during this audit. All employees were hired directly.

Good practices: Free canteen, dormitory and position allowance per month.

Worker organization details: There were six worker representatives in the factory, without Worker Organizations & Trade Unions.

Circumstances: There was no special circumstance during the audit.

Summary of findings:

PA1-Insufficient Management system and incomplete capacity assessment.

PA6-Monthly OT hour exceeding the legal requirement.

PA7-Insufficient Health & Safety management (PPE wearing, chemicals management).

PA13-Insufficient risk assessment of integrity and corruption.

Living wage calculation: #Living Wage a. No anker wage available for the producer location, so we used the data provided by auditing company. b. The calculation methodology refers to anker living wage structure. c. The data comes from the local bureau of statistics for the current year.

Attachment: a. There were no agencies used by the auditee, which made the agency labor contract not applicable. b. There was no outer contractor used by the auditee, which made the contractor license/permit not applicable. c. The auditee did not obtain any government waivers from local government, which made the government waivers submission not applicable. d. There were no collective bargaining agreements, which made the collective bargaining agreements submission not applicable. e. The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit. f. During last audit no finding was in PA12, so environmental documents were not uploaded during this follow up audit.

SITE DETAILS

Site amfori ID
xxxxxxxxxxxxxxxxxxxxxxxxxxxxx **156-005616-002**
xxxxxxxxxxxxxx

GICS Classification

Sector	Industry Group	Industry
Consumer Discretionary	Consumer Durables & Apparel	Household Durables
Sub Industry		
Housewares & Specialties		

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	1,138	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	2,300	Monthly
Calculated living wage in local currency	2,293.16	Monthly
Total sample	15	Workers

Other Metrics

Male workers	557	Workers
Female workers	581	Workers
Non-binary workers	0	Workers
Permanent workers - Male	557	Workers
Permanent workers - Female	581	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	40	Workers
Management - Female	25	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	117	Workers
Workers with night shift - Female	58	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	483	Workers
Domestic migrant workers - Female	492	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0 Workers
Foreign migrant workers - Non-binary	0 Workers
Workers hired directly - Male	557 Workers
Workers hired directly - Female	581 Workers
Workers hired directly - Non-binary	0 Workers
Workers hired indirectly - Male	0 Workers
Workers hired indirectly - Female	0 Workers
Workers hired indirectly - Non-binary	0 Workers
Unionised workers - Male	0 Workers
Unionised workers - Female	0 Workers
Unionised workers - Non-binary	0 Workers
Workers under CBA - Male	0 Workers
Workers under CBA - Female	0 Workers
Workers under CBA - Non-binary	0 Workers
Pregnant workers	0 Workers
Workers on parental leave - Male	0 Workers
Workers on parental leave - Female	0 Workers
Workers on parental leave - Non-binary	0 Workers
Sample - Male	7 Workers
Sample - Female	8 Workers
Sample - Non-binary	0 Workers

FINDINGS

PA1: Social Management System

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-005616-002

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
<p>Finding</p> <p>The auditee partially complied with this principle, according to the site audit, documentation checks, and interviews with management and employees, the factory was established in 2015, site and documentation were established and implemented with reference to local regulations and customer requirements, implemented amfori BSCI system for many years, but there were still few gaps between their implementation and amfori BSCI COC or legal requirements. For example, the factory did not effectively control workers' working hours that leading to workers' monthly overtime work exceeded 36 hours, details refer to findings on PA1, PA6, PA7 and PA13.</p> <p>It violated the requirements of amfori BSCI system manual.</p>	<p>被审核方部分遵守该原则，根据现场审核，文件检查，管理层和员工访谈，工厂于2015年成立，现场和文件均参考当地的法规和客户要求来建立和实施，已运行amfori BSCI体系多年，但工厂在实际执行方面与amfori BSCI行为准则和当地法规间仍存在少量差距，如工厂没有有效的控制工人的工作时间导致工人的月加班有超过36小时，具体查看执行领域PA1, PA6, PA7, PA13中的问题点。</p> <p>违反了amfori BSCI系统手册中的要求。</p>

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
<p>Finding</p> <p>The auditee partially complied with this principle, according to the site audit, documentation checks, and interviews with management and employees, the peak and slack season was not obvious, the factory regularly planned and evaluated capacity, but did not take into account the legal requirement of monthly overtime. The maximum monthly overtime of all sampled workers during this audit exceeded 36 hours and the maximum was 84 hours. The management said that the factory needed to arrange workers to work overtime to meet the needs of customer shipments, currently one day off per seven days and weekly hour not exceeding 60H had been ensured, also all interviewed employees expressed their willingness to work overtime.</p>	<p>被审核方部分遵守该原则，根据现场审核，文件检查，管理层和员工访谈，工厂淡旺季不明显，工厂定期进行产能计划和评估，但未将月加班的法规要求考虑在内，此次审核所有抽样工人最大月加班均超过36小时，最大达到84小时，管理层表示工厂需要安排工人加班满足客户出货，目前保证七休一和周工时不超过60小时，访谈的员工都表示愿意加班。</p> <p>违反了amfori BSCI系统手册中的要求。</p>

Finding

It violated the requirements of amfori BSCI system manual.

PA 6: Decent Working Hours

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-005616-002

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

Finding

The auditee did not comply with this principle, according to site audit, document checks, and interviews with management and employees, the monthly overtime working hours of sampled workers exceeded the legal requirement. Total 15 workers were sampled during this audit, and the sampling month was Apr. 2024, 15 workers' monthly OT was 60-74H; In Aug. 2024, 15 workers' monthly OT was 74-84H; In Dec. 2024, 15 workers' maximum monthly OT was 63-74H, and maximum monthly OT occurred on injection and die-casting workers of two shifts. The management said that the legal requirement of 36H per month could not be effectively implemented by the factory at present. Also interviewed workers said that they were willing to work overtime to increase their income, and working overtime was a voluntary choice.

The maximum monthly overtime for Feb. 2025 was 56 hours, and the maximum monthly overtime for Mar. 2025 was 52 hours (till 21 Mar. 2025).

It violated PRC Labor Law, Article 41

LOCAL LANGUAGE

被审核方未遵守该原则，根据现场审核，文件检查，管理层和员工访谈，所有抽样工人的月加班工时均超过法定要求。此次审核共抽样15名工人，抽样月份2024年4月，15名工人的月加班为60-74小时；2024年8月，15名工人的月加班为74-84小时；2024年12月，15名工人的最大月加班为63-74小时，最大加班时间发生在两班倒的注塑和压铸工人。管理层表示法规要求的每月36小时目前工厂无法有效实施，而且访谈的工人表示他们愿意加班来增加收入，加班是自愿选择。

2025年2月份的最大月加班时间为56小时，2025年3月份的最大月加班时间为52小时(截止到2025年3月21日)。

违反了《中华人民共和国劳动法》第41条

PA 7: Occupational Health and Safety

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-005616-002

Question: 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH

Finding

The auditee partially complied with this principle,

LOCAL LANGUAGE

被审核方部分遵守该原则，根据现场审核，管理层

Finding

according to site audit, and interviews with management and workers, the factory provided employees of most stations with proper PPEs, such as polishing workers wearing earplugs, dust masks, goggles, mold workers wore labor protection shoes, etc., but during this audit still 30% pad printing workers did not wear protective gloves, although the reminder to wear gloves was posted on site, and management also said gloves were issued to workers, the workers said that it was inconvenient to operate, so they did not wear them.

It violated Work Safety Law of the People's Republic of China, Article 45.

和员工访谈，工厂给大多数岗位的工人都提供合适的劳保用品，如打磨工人佩戴耳塞，防尘口罩，护目镜，搬运模具工人穿劳保鞋等，但此次审核仍有30%的移印工人未佩戴防护手套，虽然现场有张贴佩戴手套的提醒，管理层也表示手套有发放给工人，但工人表示不方便操作，所以没佩戴。

违反了《中华人民共和国安全生产法》，第45条

Question: 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

ENGLISH

Finding

The auditee partially complied with this principle, according to the site audit, and interviews with management and workers, the factory had set up a separate chemical warehouse, while the chemicals used in the painting and pad printing workshop were also effectively managed, but about 5% chemicals in the oil mixing room (such as ink and diluent) were not stored in secondary containers, and there was no safety label, the workers said to be convenient of mixing the oil operation, so not according to the requirements, the management stated that the follow-up supervision would be strengthened.

It violated Regulations on Safety in Workplaces Where Chemicals Are Used, Article 12 and Code of Design on Building Fire Protection and Prevention GB50016-2014, Article 3.6.12

LOCAL LANGUAGE

被审核方部分遵守该原则，根据现场审核，管理层，员工访谈，工厂设置了单独的化学品仓库，同时在喷油车间和移印车间使用的化学品也进行有效管理，但在调油房约5%的化学品(如油墨和稀释剂)未存放在二次容器中，且无安全标签，工人表示为了方便调油操作，所以没有按要求，管理层表示后续加强监督。

违反了工作场所安全使用化学品规定第十二条和建筑设计防火规范GB50016-2014 第3.6.12条

PA 13: Ethical Business Behaviour

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-005616-002

Question: 13.1 Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially complied with this principle, according to documentation checks, and interviews with management and employees, after last audit the factory had not updated the risk assessment of integrity and corruption, and the prevention and control measures for different positions still showed the same, and different prevention and control measures had not been formulated according to the risk characteristics of different positions. Management indicated that this problem was ignored in the improvement process and subsequent updates were made. It violated the requirements of amfori BSCI system manual.

被审核方部分遵守该原则，根据文件查阅，管理层访谈和员工访谈，上次审核后工厂未进行廉政腐败风险评估的更新，针对不同岗位的防控措施仍然显示一样，没有根据不同岗位的风险特性制定不同的防控措施。管理层表示改善的过程中忽略了这个问题点，后续更新。

违反了amfori BSCI系统手册中的要求。