

Monitored Party	xxxxxxxxxxxxxxxxxx	amfori ID	156-004340-000	Address	xxxxxx China
				Monitoring Partner	SGS
Monitoring Activity	amfori Social Audit - Manufacturing	Monitoring Type	Full Monitoring	Submission Date	15/04/2025
Monitoring Start Date	07/04/2025	Closing Meeting Finished Date	08/04/2025		
Expiration Date	15/04/2026	Announcement Type	Semi Announced		
Site	xxxxxxxxxxxxxxxxxxxx	Site amfori ID	156-004340-002		

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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	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: Lulu Jiang; APSCA membership number (CSCA 21702049)

Name of team auditor (if applicable): Nil

Name of observers, translators, trainees, advisors/consultants (if applicable): Nil

Monitoring partner name: SGS (Monitoring firm APSCA #: 11600006)

Audit schedule details: The audit was conducted by 1 auditor x 1.5 days. The full audit (Semi-Announced) was conducted on April 7-8, 2025.

Business partner information: Limited liability company

Factory name: xxxxxxxxxxxxxxxxxxxxxx., LTD.

Factory address: China

Business license number: xxxxxxxxxxxxxxxx, the validity period of business license was from Jan. 17, 2014 to long term.

The main products of auditee were: Ballpen/ Mechanical pencil/Roller pen/Pen sets. The mainly processes were injection molding, metalworking, assembly, inspection, packing. The annual production volume were 100,000,000 pcs.

Audited location information:

The plant was owned by the factory. The factory used one 3-storey and two 2-storey buildings. The factory rented out one 2-storey building and one 4-storey building to xxxxxxxx. Lease contracts and independent business licenses were provided for review. No worker, management systems was exchanged. This audit only covered the area that used by the auditee.

The dormitory was not provided for workers. The factory bought food from offsite restaurant for workers and canteen was provided for workers. The details were as follows:

The auditee used the following 3 buildings:

No. 1: About 1335 Sq. meters. one 3-storey office building.

No. 2: About 5812 Sq. meters.

Floor 1: raw materials and finished goods warehouse. Floor 2: assembly, packing workshop and canteen.

No. 3: About 5812 Sq. meters.

Floor 1: Injection molding and metalworking workshop. Floor 2: assembly and packing workshop, parts warehouse.

Operating shifts and hours: The factory made a rule of working hours system and controlled working hours. The regular workday was from Monday to Friday with 8 hours per day. Injection molding workers worked in 2 shifts: 07:30-19:30, 19:30-07:30, each shift had 2 hours for meals and rest, and 2 hours overtime. Other production workers worked in one shift: 07:30-11:30, 12:30-16:30. 2 hours per day were arranged on some workdays (17:30 to 19:30), and max 8 hours overtime were arranged on Saturday irregularly. Office workers worked in one shift: 08:00-12:00, 13:00-17:00. All workers had one day off per seven days. the maximum overtime hour was 2 hours per day and 88 hours per month. The max weekly working hours were 60 hours.

The detailed weekly working hours as below:

Feb.2025 – standard hours (40) + maximum weekly OT (20)

Dec.2024 – standard hours (40) + maximum weekly OT (20)

Jun. 2024 – standard hours (40) + maximum weekly OT (20)

Time recording system: The factory used electronic attendance system to record working hours.

Salary payment details: All workers were paid by hourly rate. Workers were paid on 28th of next following month by bank. The factory provided the payroll from Mar. 2024 to Feb. 2025 and the attendance record from Mar. 1, 2024 to the audit day. The workers' minimum wage was RMB 3400 per month/RMB 19.54 per hour which was met with local minimum wage requirement (RMB 2490 per month/RMB 14.3 per hour since Jan. 2024). The factory had paid all workers at a legal mandated rate for their overtime hours, respectively 150%, 200% and 300% of regular pay for overtime work on weekdays, rest days and statutory holidays respectively. The factory had provided paid statutory holidays and annual leaves for all employees.

Worker number information:

•Total worker number: 97 workers including 81 production workers and 16 non-production workers.

•Production worker number: 81 including 39 male workers and 42 female workers.

•Vulnerable worker number: Domestic migrant employees: 16 (8 male workers and 8 female workers), no underage workers, child workers, disabled workers, lactating employees, pregnant women.
•Any other special group workers (interns, apprentices, contractor workers etc.): No interns, apprentices, contractor workers in the factory during the audit.

Good practices: 1. The factory provided a hygiene kit for female employees (such as menstrual products). 2.The factory provided free meal for workers.

Worker organization details: The factory organized workers electing four worker representatives in 2024 Year. The worker representatives and workers worked together in the workshop, and they could communicate comments and suggestions freely.

Circumstances: There was no special circumstance during the audit.

The special circumstances can be classified as followed: Based viewing IPE check, the auditor does not have a special abnormal situation in recent two years.

Summary of findings:

PA1: 1.1 Some issues about safety and health and other were identified in the audit. 1.4: The auditee did not arrange production plan in accordance with amfori BSCI requirement of overtime, the auditee did not control overtime per the regulation's requirement.

PA2: 2.4: The factory did not check the effect of BSCI training.

PA5: 5.4: The factory did not collect the datum and conduct the assessment for the remuneration of decent standard of living as per amfori BSCI requirements. Meanwhile, the interviewed workers and factory management did not understand the remuneration of decent standard of living.

PA6: 6.2: The overtime working hours of some workers exceeded legal requirement 36 hours.

PA7: 7.1: The auditee had established complete management system on health and safety. But there were still findings issued due to management negligence. 7.3: The factory did not provide pre-job , on-job and off-job occupational health examinations for workers who exposed to occupational factor. 7.7: Chemical was missing identified label. 7.11: Some materials were stored against the wall. 7.25: The factory did not conduct regular monitoring of occupational hazardous factors (such as noise, chemical) in workshop.

PA12: The factory had conducted environment impact assessment, and obtained the approval of EIA report but did not obtain the final acceptance of completion of environmental projects.

PA3, PA4, PA8, PA9, PA10, PA11, PA13 was no finding.

Living wage: The living wage data is obtained from GLWC website.

Precautions taken about #COVID-19 in the facility: No Precautions taken about #COVID-19 in the facility in China.

Personal Information protection law:The Personal Information Protection Law of the People's Republic of China was promulgated on August 20, 2021, the producer ensured that relevant personal data and information provided to SGS auditor(s) has been obtained the individual's consent during the audit.

Attachments : 1.There was no agency used by the auditee, which makes the agency labour contract not applicable. 2. The Government waivers were not applicable in the auditee. 3. The Collective bargaining agreements were not applicable in the auditee.

SITE DETAILS

Site
xxxxxxxxxxxxxxxxxxxxx.,LT
D.

Site amfori ID
156-004340-002

GICS Classification

Sector
Consumer Discretionary

Industry Group
Consumer Durables & Apparel

Industry
Leisure Products

Sub Industry
Leisure Products

amfori Process Classifications

N.A.

GS1 Classifications

Segment
Family
Product Class

Stationery/Office
Machinery/Occasion
Supplies
Stationery/Office Machinery
Writing/Design Implements/
Aids

NACE Classification

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	97	Workers
Legal minimum wage in local currency	2,490	Monthly
Lowest wage paid for regular work at the site	3,400	Monthly
Calculated living wage in local currency	4,543	Monthly
Total sample	10	Workers

Other Metrics

Male workers	47	Workers
Female workers	50	Workers
Non-binary workers	0	Workers
Permanent workers - Male	47	Workers
Permanent workers - Female	50	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	2	Workers
Management - Female	2	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	2	Workers
Workers with night shift - Female	4	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	8	Workers
Domestic migrant workers - Female	8	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	47	Workers
Workers hired directly - Female	50	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	5	Workers
Sample - Female	5	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: xxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

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
Finding	
1.1 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour it was identified that the auditee established complete social accountability policy and procedure on the basis of amfori BSCI Code, nevertheless some procedures were not implemented effectively, some issues about working hours, safety and health and other were identified in the audit. It violated the requirement of question 1.1 in amfori BSCI system manual.	被审核方部分遵循该原则。原因是通过管理者访谈，员工访谈，文件审核，现场走访发现，被审核方建立了基于amfori BSCI的完整的社会责任政策和程序，但是一些程序未有效执行，导致工时、健康安全等问题的发生。违反了amfori BSCI管理手册中问题1.1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
Finding	
1.4 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour, the auditee established a capacity planning program, but the auditee only arranged the production plan according to the delivery time, the auditee did not arrange production plan in accordance with amfori BSCI requirement of overtime, the auditee did not control overtime per the regulation's requirement, employee's monthly overtime had exceeded the limit of local law. It violated the requirement of question 1.4 in amfori BSCI system manual.	主要被审核方部分遵循该准则。原因是通过管理者访谈，员工访谈，文件审核，现场走访发现，被审核方制定了产能规划的程序，但是目前只是按照出货时间来排生产计划，被审核方未按amfori BSCI加班时间的要求安排生产计划，被审核方没有按法规要求来管控加班时间，员工的月加班时间超过法规要求。违反了amfori BSCI管理手册中问题1.4的要求。



PA 2: Workers Involvement and Protection

Site: xxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

Question: 2.4 Is there satisfactory evidence that the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation?

ENGLISH

LOCAL LANGUAGE

Finding

2.4 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour it was identified that most interviewed workers did not know the social responsibility and amfori BSCI Code. Though the auditee had conducted relevant training of amfori BSCI code to workers in Dec. 2024 and posted amfori BSCI code onsite, but the auditee did not check the effect of training. It violated the requirement of question 2.4 in amfori BSCI system manual.

主要被审核方部分遵循该准则。原因是通过管理者访谈，员工访谈，文件审核，现场走访发现大部分访谈的员工不了解社会责任的要求和amfori BSCI。虽然工厂在2024年12月对员工进行了amfori BSCI相关内容的培训，现场张贴了amfori BSCI行为准则，但没有验证培训的效果。违反了amfori BSCI管理手册中问题2.4的要求。

PA 5: Fair Remuneration

Site: xxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH

LOCAL LANGUAGE

Finding

5.4 The main auditee partially respected this principle because the factory did not collect the datum and conduct the assessment for the remuneration of decent standard of living as per amfori BSCI requirements. Meanwhile, the interviewed workers and factory management did not understand the remuneration of decent standard of living. It violated the requirement of question 5.4 in amfori BSCI system manual.

主要被审核方（生产商）部分遵循该准则：工厂没有按照amfori BSCI要求收集相关数据并对当地体面生活工资标准进行评估。同时员工和管理层不理解体面生活工资标准。违反了amfori BSCI管理手册中问题5.4的要求。

PA 6: Decent Working Hours

Site: xxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

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

LOCAL LANGUAGE

Finding	
<p>6.2 Finding: The main auditee did not respect this principle because the monthly overtime hours of workers in the auditee exceeded legal limit, based on management interview and workers interview and three sampled months' attendance records (Feb. 2025(1st sampled month); Dec.2024(2nd sampled month); Jun.2024(3rd sampled month)) review, all sampled months' overtime working hours of all sampled workers exceeded legal requirement 36 hours.</p> <p>The detailed working hours as below: Feb. 2025 – standard hours (120) + maximum monthly OT (50) Dec.2024 – standard hours (176) + maximum monthly OT (84) Jun.2024 – standard hours (152) + maximum monthly OT (88)</p> <p>The auditee stated that due to the workers' desire for more overtime pay and the demand for order quantity, employees worked overtime. It violated Labor Law of the People's Republic of China (2018 Amendment), Article 41.</p>	<p>主要被审核方未遵循该准则。因为工人月加班超时，根据管理层访谈、员工访谈及抽样三个月（2025年2月（第一个抽样月）；2024年12月（第二个抽样月）2024年6月（第三个抽样月））显示所有抽样月份所有抽样员工的月加班时间超过法规要求的36小时，具体工时数据如下：</p> <p>2025年2月-标准工时（120）+最大月加班时间（50） 2024年12月-标准工时（176）+最大月加班时间（84） 2024年6月-标准工时（152）+最大月加班时间（88）</p> <p>被审核方表示由于工人希望获得更多的加班费以及订单量的需求，所以员工加班超时。违反了中华人民共和国劳动法（2018修正）第四十一条。</p>

PA 7: Occupational Health and Safety

Site: xxxxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?	
ENGLISH	LOCAL LANGUAGE
Finding	
<p>7.1 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour it was identified that the auditee had established complete management system on health and safety, including identification and awareness of related legal regulation, health and safety check, training etc. But there were still findings issued due to management negligence. It violated the requirement of question 7.1 in amfori BSCI system manual.</p>	<p>主要被审核方部分遵循该准则。通过管理者访谈，员工访谈，文件审核，现场走访发现被审核方建立了完整的健康安全管理体系，包括相关法规的识别与了解，健康安全检查，培训等。但是由于管理疏忽，导致仍然有问题发生。违反: amfori BSCI管理手册中问题7.1的要求。</p>

Question: 7.3 Is there satisfactory evidence that the auditee set up an effective management system that ensures they regularly carry out risk assessments for safe, healthy and hygienic working conditions?

ENGLISH	LOCAL LANGUAGE
Finding	
7.3 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour it was identified that the factory conducted risk assessment, but the factory did not provide pre-job, on-job and off-job occupational health examinations for workers who exposed to occupational factor such as noise and chemical. It violated Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35.	主要被审核方部分遵循该准则。通过管理者访谈，员工访谈，文件审核，现场走访发现被审核方进行了风险评估，但是工厂未给接触职业因素如噪音，化学品的员工提供岗前，岗中及离岗职业健康体检。违反了中华人民共和国职业病防治法（2018修正）第三十五条。

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	LOCAL LANGUAGE
Finding	
7.7 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour MSDS was post on site but chemical such as cleaner was not post chemical label. It violated Regulations on Labor Protection in Workplaces Where Toxic Substances Are Used (2002), Article 23.	主要被审核方部分遵循该准则。原因是通过管理者访谈，员工访谈，文件审核，现场走访发现MSDS张贴在现场，但是化学品如清洗剂没有标签。违反了使用有毒物品作业场所劳动保护条例（2002）第二十三条。

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH	LOCAL LANGUAGE
Finding	
7.11 Finding: The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site and site tour it was identified that some materials were stored against the wall. It violated Regulations on Fire Prevention of Warehouse (1990), Article 18.	主要被审核方部分遵循该准则。原因是通过管理者访谈，员工访谈，文件审核，现场走访发现部分物料靠墙存放。违反了仓库防火安全管理规则（1990）第十八条。

Question: 7.25 Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination are adequate for the health and safety of workers?

ENGLISH	LOCAL LANGUAGE
Finding	
7.25 The main auditee partially respected this principle because based on management interviews, worker interviews, document review and site tour it was identified that the factory did not conduct regular monitoring of occupational hazardous factors (such as noise,chemical) in workshop. It violated Regulations of Occupational Health Management at Work Sites (2020), Article 20.	主要被审核方部分遵循该准则。原因是通过管理者访谈，员工访谈，文件查阅及现场走访发现工厂未对车间进行定期的职业危害因素（如噪音,化学品）监测。违反了：《工作场所职业卫生管理规定（2020）》第二十条。

PA 12: Protection of the Environment

Site: xxxxxxxxxxxxxxxxxxxxxxxx.,LTD. | Site amfori ID: 156-004340-002

Question: 12.3 Is there satisfactory evidence of the auditee's required environmental permits and licences?

ENGLISH	LOCAL LANGUAGE
Finding	
12.3 The main auditee partially respects this principle because: the factory had conducted environment impact assessment, and obtained the approval of EIA report but did not obtain the final acceptance of completion of environmental projects. It violated Regulations on the Administration of Construction Project Environmental Protection (2017 Revision), Article 17	主要被审核方部分遵循该准则。工厂进行了环境影响评估，并获得了环评批复，但未能获得环境项目竣工验收报告。违反了：《建设项目环境保护管理条例（2017修订）》第十七条。