

Monitored Party xxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxx	amfori ID 156-002182-000	Address xxxxxxxxxxxxxxxxxxxxxxxxxxxx, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner ALGI HOLDING COMPANY LLC
Monitoring Start Date 20/11/2024	Closing Meeting Finished Date 22/11/2024	Submission Date 27/11/2024
Expiration Date 27/11/2025	Announcement Type Semi Announced	
Site xxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxx	Site amfori ID 156-002182-002	

This is an extract of the online Monitoring Result, generated on 28/11/2024, 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	D	
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	

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	C	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Jason Zhang (lead auditor),
APSCA membership number: CSCA 21701961
Name of team auditor (if applicable): None
Name of observers, translators, trainees, advisors/consultants (if applicable): None
Monitoring partner name: ALGI China

Audit schedule details:

The audit was planned for 1 auditor x 3 onsite person-days.
The semi announced full audit was conducted on November 20-22, 2024.

Business partner information:

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx, Uniform Code of Social Credit: 91330326MA285GB685) was located at
xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx, China. The factory was registered in 2016 according to management conversation and
business license. The factory was specialized in manufacturing of luggage. Main production activities included
thermoforming, trimming, cutting, sewing, assembly, inspection and packing. No production process was subcontracted.

Audited location information:

The factory used one 7-storey production building as workshops, warehouses and offices. The total construction area was
about 25500 square meters. The factory did not provide canteen/kitchen, dormitory and transportation to its workers. Floor
details of each building were listed below:

One 7-storey production building:

1F was used as thermoforming, trimming workshop, material and finished goods warehouse.
2F was used as cutting workshop and material warehouse.
3F was used as packing workshop and finished goods warehouse.
4F was used as assembly, inspection and packing workshop.
5F was used as sewing, assembly, inspection and packing workshop.
6F was used as components warehouse and office.
7F was used as components warehouse.

Operating shifts and hours:

The regular working hours for workers were from 7:00 to 17:00 in one shift with lunch break from 11:00 to 13:00. Normal
working days were from Monday to Friday. The workers generally worked overtime voluntarily up to 2 hours from 18:00 to
20:00 on weekdays and for 8 hours per day on Saturdays.

Time recording system:

The factory used electronic attendance system to record employees working hours. And the attendance records of 25
sampled workers from October 1, 2023 to the audit day were reviewed.

Payroll reviewed:

Auditor reviewed the payroll records from October 2023 to September 2024, and selected 25 workers' payroll records of
March, August and September 2024 as sampled months.

Salary payment details:

Based on documents review and management interview, it was noted that all employees were paid by hourly rate. The
wages for the preceding month were paid by bank transfer before the end of each month.

Worker number information:

On the audit day, there were total 546 employees on the roster. Among them 483 employees (268 males and 215 females)
were production workers. There were 74 retirees and 307 domestic migrant workers in the factory. No other special group
of workers were noted during the audit.

Good practices:

No Good practice was noted in the audit.

Worker organization details:

The factory employees elected 8 workers as worker representatives in April 2024, according to document review and interview.

Circumstances:

Mr. Chen Shiqing / Administration, Ms. Chen Yanyan / Administration and Ms. Zheng Zhou / Worker representative participated in the opening (started at 8:00 on November 20, 2024) and closing meeting (ended at 17:00 November 22, 2024). The auditor communicated the findings in detail to them, answered questions, and made necessary clarifications. Finally, they agreed on the findings and signed the on-site audit findings report.

No special circumstance was noted.

Summary of findings:

PA1: Social Management System

PA1.1. The social management system not implemented effectively.

PA1.4. Procedure on workforce planning not running effectively and led to excessive overtime hours.

PA 2: Workers Involvement and Protection

PA 2.5. Established grievance mechanism did not cover all interested parties.

PA 5: Fair Remuneration

PA 5.4. The factory did not have enough awareness of basic living wage, and they did not calculate it.

PA 5.5. Insufficient social insurance coverage.

PA 6: Decent Working Hours

PA 6.2. Monthly overtime hours exceeded 36 hours.

PA 7: Occupational Health and Safety

PA 7.1. Non-compliances with Health and Safety local law and regulations and finished goods and materials were stored against the wall and pillar.

PA 7.7. Poor management on chemical.

PA 7.9. Poor management on warning signs.

PA 7.17. Some sampled sewing machines were not installed with pulley guards.

PA 7.22. The factory did not place toilet paper in all production workshop toilets.

PA 12: Protection of the Environment

PA 12.2. There was finding which was not fully in compliance with the law requirements regarding environment impact assessment (EIA) approval.

PA 12.3. The facility did not provide EIA approval from local environment department.

PA 13: Ethical Business Behaviour

PA 13.4. Inadequate procedure related to personal information protection.

Living wage calculation:

The local legal minimum wage standard was CNY 2010 per month (or equivalent to CNY 11.55 per hour) since January 1, 2024 and CNY 1840 per month (or equivalent to CNY 10.57 per hour) before that.

#Living Wage: [The audited factory located in Wenzhou City, which cannot be found on the GLWC website. Thus, the auditor used the basic living wage CNY 2895.06, which was manually collected and calculated by the auditor through Anker's methodology.

The Living wage calculation technique used by the auditor is to be inquired the resident consumption parameters published on the local government's public website and yearbook. Afterwards, there are calculated the relevant data of local living wage according to the proportion of Anker methodology of the key parameters. Relevant data comes from the website or yearbook data published by the local government. Basic Living Wage calculation manually collected by the auditor is uploaded as part of the report attachments.]

Precautions taken about #COVID-19 in the facility:

Not applicable.

Personal data protection:

Some uploaded attachments (such as wage records and time records) involve employees' personal information, which is protected. This is to comply with the requirements of the Personal Information Protection Law of the People's Republic of China and GDPR.

Remark:

The government waiver, agency labor contract and collective bargaining agreement were not available for the factory on the audit day, which made those documents not applicable.

SITE DETAILS

Site

XXXXXXXXXXXXXXXXXXXXX
XXXXX

Site amfori ID

156-002182-002

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Household Durables

Sub Industry

Housewares & Specialties

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	546	Workers
Legal minimum wage in local currency	2,010	Monthly
Lowest wage paid for regular work at the site	4,400	Monthly
Calculated living wage in local currency	2,895.06	Monthly
Total sample	25	Workers

Other Metrics

Male workers	311	Workers
Female workers	235	Workers
Non-binary workers	0	Workers
Permanent workers - Male	311	Workers
Permanent workers - Female	235	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	10	Workers
Management - Female	6	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	0	Workers
Workers with night shift - Female	0	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	190	Workers
Domestic migrant workers - Female	117	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	311	Workers
Workers hired directly - Female	235	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	12	Workers
Sample - Female	13	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

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	
Based on onsite observation, document review, management and workers interviews, it was noted that the factory did not have an effective management system regarding Social Management System, Workers Involvement and Protection, Fair Remuneration, Decent Working Hours, Occupational Health and Safety, Protection of the Environment and Ethic Business Behavior. (For details, please refer to Performance Area 1, 2, 5, 6, 7, 12 and 13 respectively.) The management representative declared they did not inspect and review management system enough and failed to identify problems in a timely manner. The question is rated as partially because the factory had set up management system to comply with amfori BSCI Code of Conduct but not implemented effectively in some performance areas. This is partially in compliance with requirements of BSCI CoC.	根据现场审核，文件检查，管理层和员工访谈，发现企业社会管理体系、工人参与和保护、公平报酬、体面的工作时间、职业健康和安全，环境保护以及商业道德行为方面缺少有效的管理。（详细分别见第1、2、5、6、7、12和13部分）。管理者代表表示工厂对管理体系检查和评审不足，未能及时发现问题。该问题被评为局部符合，因为工厂有建立社会责任管理体系以符合amfori BSCI行为准则，但由于管理体系不够完善以至于工厂在部分绩效领域存在缺失。这仅局部符合BSCI CoC。

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	
Based on document review, management and worker interviews, it was noted that no sufficient evidence to prove that the factory had effectively assessed and properly planned its workforce capacity. Besides that, the monthly overtime work which exceeded the local law of 36 hours occurred for the sampled workers in the sampled months of September 2024, August 2024 and March 2024. (See details as 6.2). Management representative explained the factory needs to balance the overall salary of employees, turnover rate and product delivery and other issues, so workers' overtime hours exceeded law requirement. The question is rated as no because workers' monthly overtime	基于文件审核，管理访谈和员工访谈，无充分证据表明工厂对现有员工产能是否可以按时完成客户订单数量进行了有效评估和合理计划，从而来控制并预期在生产过程中减少影响质量的不必要的加班。此外，所有抽样员工在抽样月2024年9月、2024年8月和2024年3月的月加班超过法定规定36小时的加班工作的情况发生（详见PA6.2）。管理者代表表示工厂需要平衡员工的总体工资、周转率，产品交付和其他事项，这导致了加班超时。该问题被评为不符合，因为员工的月加班时间系统性的超过了法规要求。这不符合《中华人民共和国劳动法》第41条。

Finding

hours exceeded local law requirement systematic.
This is not in compliance with requirements of PRC
Labor Law article 41.

PA 2: Workers Involvement and Protection

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

Question: 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH

LOCAL LANGUAGE

Finding

Based on management and worker interviews, and documents review it was identified that, the established grievance mechanism did not include all interested parties, such as communities. The management representative declared they did not inspect and review grievance mechanism enough and failed to identify problems in a timely manner. The question is rated as partially because the factory established grievance mechanism which could be used for internal part. This is partially in compliance with requirements of BSCI CoC. Remark: In the factory, 8 worker representatives were elected freely, and suggestion box was equipped. The interviewed workers expressed that they would complain to the worker representatives, the management face to face or by suggestion box if necessary.

根据管理层和员工访谈，和文件查看发现，工厂建立的申诉机制没有包含所有利益相关方，如社区等。管理者代表表示工厂对申诉机制检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂建立了对工厂内部适用的申诉机制。这局部符合BSCI CoC。
备注：工厂自由选出了8名员工代表，配备了员工意见箱。被访谈员工表示，如果必要，他们可以当面向员工代表，管理层或者通过意见箱表达不满或抱怨。

PA 5: Fair Remuneration

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

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

Based on management and workers interview, and documents review, the factory established the procedure on the basic living wage, but the management staffs did not know clearly what the basic living wage was, and they did not calculate

依据管理层和员工交谈，文件查阅，工厂建立了基本生活工资程序，但管理人员不清楚基本生活工资是什么且他们未计算当地生活工资。本次审核，审核员使用了根据当地政府最新数据采用Anker计算方法计算的基本生活工资2895.06元，发现在所有抽样

Finding	
<p>the local living wage. During the audit, auditor used the basic living wage CNY 2895.06, which was calculated by the auditor through Anker's methodology based on the newest datum from the local government, it was noted that the regular wages of 25 sampled workers for regular work in sampled months were from CNY 4400 to CNY 5000 which were higher than the local living wage. The management representative declared they did not inspect and review living wage enough and failed to identify problems in a timely manner. The question is rated as partially, because the management staffs did not know clearly what the basic living wage was, but the regular wage of workers were higher than the local living wage. This is partially in compliance with requirements of BSCI CoC.</p>	<p>月，25名抽样员工在抽样月份的正常工作时间的工资为每月4400到5000元，这高于当地生活工资。管理者代表表示工厂对生活工资检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂不清楚基本生活工资，但员工的正常工资高于当地生活工资。这部分符合amfori BSCI CoC的要求。</p>

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
Finding	
<p>Based on the document review, management and workers interviews, not all employees were provided with social insurance. As per reviewing the participation status and receipt from November 2023 to October 2024, it was noted that in October 2024, there were total 546 employees (all employees were permanent, including 74 retired employees and 31 new employees, no temporary or dispatched employees in this factory), and 300 out of 441 eligible employees (68%) participated in pension, unemployment, medical and maternity insurance, and 400 eligible employees (90.7%) participated in injury insurance. The factory provided commercial injury insurance (valid from March 15, 2024 to March 14, 2025) to all other employees. There was no social insurance waiver available. The management representative stated most workers did not want to buy social insurance, which was confirmed by worker interview. This question was rated as no, as workers covered by social insurance did not exceed 80 percent. This is not in compliance with Articles 72 and 73 of the Labor Law of the People's Republic of China.</p>	<p>通过文件审核，管理层及员工访谈发现，社保没有覆盖到所有员工。根据查看2023年11月到2024年10月的社保台账和收据发现，2024年10月工厂一共有546名员工（所有员工为长期员工，包括74退休工和31名新员工，没有临时工和派遣工），但441名员工中有300名员工（68%）参加了养老，失业，医疗和生育保险工伤保险，有400名员工（90.7%）参加了工伤保险。工厂向其余所有员工提供了商业工伤险（有效期2024年3月15日到2025年3月14日）。工厂没有取得社保证明。管理者代表表示大部分员工不愿意购买社会保险，员工访谈证实了这一点。该问题被评为不符合，因为参加保险的员工没有超过80%。这不符合《中华人民共和国劳动法》第72、73条的要求。</p>

PA 6: Decent Working Hours

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

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	
Based on document review, management interview and worker interviews, it was noted that the monthly overtime exceeded legal requirement. The monthly overtime for 25 out of 25 randomly selected employees exceeded 36 hours and up to 50 hours in September 2024 (last paid month), 25 out of 25 randomly selected employees exceeded 36 hours and up to 66 hours in August 2024 (randomly selected month) and 25 out of 25 randomly selected employees exceeded 36 hours and up to 60 hours in March 2024 (randomly selected month). The factory management declared that the factory did not establish a contingency plan in case something slows down or interrupts production. The question is rated as no because workers' overtime exceeded legal limits systematically. This is not in compliance with requirements of the PRC Labor Law article 41. Remark: The workers' overtime work was voluntary.	基于文件审核，管理访谈和员工访谈，工厂的月加班工时超过法定要求的36小时。2024年9月（最近发薪月），25/25名被抽查员工月加班工时超过36达到50小时；2024年8月（随机月），25/25名被抽查员工月加班工时超过36达到66小时；2024年3月（随机月），25/25名被抽查员工月加班工时超过36达到60小时。管理者代表表示工厂未建立应急计划以防发生减慢或中断生产的情况。该问题被评为不符合，因为员工的月加班时间系统性的超过了法规要求。这不符合《中华人民共和国劳动法》第41条。 备注：员工均为自愿加班。

PA 7: Occupational Health and Safety

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

ENGLISH	LOCAL LANGUAGE
Finding	
1. Based on management and worker interviews, document review and onsite observation, the factory developed the occupational health & safety procedures, assigned manager to take charge of the whole health & safety issues. However, there were findings which were not fully in compliance with the law requirements regarding goods storage, chemical management, warning signs and machine safety. The question is rated as partially because the factory complies with local regulations in most areas of health and safety. The management	1. 根据管理层和员工访谈，文件审核和现场观察发现，工厂有制定职业健康安全程序文件并指派经理负责整个健康安全事宜。然而，还存在货物存放，化学品管理，警示标识和机械安全方面不符合法规要求的问题。此问题点判定为局部符合原因在于工厂在绝大多数的健康安全领域符合当地法规的要求。工厂管理层表示会采取措施尽快符合所有的法规要求。这部分遵循了当地健康安全方面的法规（具体的健康安全法规条款请参阅PA7.1, PA7.7, PA7.9, PA7.17）。 2. 基于现场走访，发现仓库约30%的成品和原料靠

Finding	
<p>declared that they would take measures to meet all requirements of local laws as soon as possible. This is partially in compliance with requirements of relevant local health and safety laws (Please refer to question points PA7.1, PA7.7, PA7.9, PA7.17 for specific health and safety regulations).</p> <p>2. During the onsite visit, it was noted that about 30% of finished goods and materials were stored against the walls and pillars. The management representative explained that they want to save more space. This was partially in compliance with the Rules Concerning Warehouse Safety and Fire Control, Article 18.</p>	<p>墙和柱子堆放。管理者代表解释说他们想节省更多空间。这局部符合《仓库防火安全管理规划》第18条。</p>

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	
<p>Based on management and worker interviews, document review and onsite observation, the factory did not equip second containers, and did not post SDS and safety label for all chemicals (machine oil tc.) stored in chemical warehouse. The management representative declared they did not inspect and review chemicals enough and failed to identify problems in a timely manner. The question is rated as partially because most chemical was in compliance with legal requirement. This was partially in compliance with the Safety Management of Dangerous Chemicals Article 15 and 20.</p>	<p>根据管理层和员工访谈，文件审核和现场观察发现，工厂化学品仓库存放的化学品（机油等）没有配备二次容器，且未张贴SDS和安全标签。管理者代表表示工厂对化学品检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂的大部分化学品符合法规要求。这部分符合《危险化学品安全管理条例》第十五条和第二十条。</p>

Question: 7.9 Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on management and worker interviews, document review and onsite observation, the factory did not post high temperature nearby water drinking area. The management representative declared they did not inspect and review warning signs enough and failed to identify problems in a timely manner. The question is rated as partially</p>	<p>根据管理层和员工访谈，文件审核和现场观察发现，工厂饮水区附近未张贴高温警示标识。管理者代表表示工厂对警示标识检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂大部分标识符合要求。这部分符合《安全标志及使用导则》（GB 2894-2008）第4条。</p>

Finding

because most warning signs were in compliance with legal requirement. This is partially in compliance with the Warning Sign in the Guidelines for Safety Signs and Usage (GB 2894-2008) Article 4.

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

Based on management and worker interviews, onsite observation and documents review it was identified that 2 out of 7 sampled sewing machines were not installed with pulley guards. The management representative declared they did not inspect and review equipment safety enough and failed to identify problems in a timely manner. The question is rated as partially because safeguards of most equipment were in compliance with legal requirement. This is partially in compliance with General Rules of Design on Health and Safety of Production Facility (GB 5083-1999) 6.1.

根据管理层和员工访谈，现场观察和文件查看发现，7台抽样车缝设备中2台没有安装皮带轮保护罩。管理者代表表示工厂对设备安全检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂大部分设备的防护符合法规要求。这局部符合《生产设备安全卫生设计总则(GB5083-1999)》第6.1条。

Question: 7.22 Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?

ENGLISH

LOCAL LANGUAGE

Finding

Based on management and worker interviews and onsite observation it was identified that the factory did not place toilet paper and soap in all production workshop toilets. The management representative declared they did not inspect, and review provided facility enough and failed to identify problems in a timely manner. The question is rated as partially because the factory provided clean toilets and washing facilities. This is partially in compliance with BSCI CoC.

据管理层和员工访谈和现场观察发现，工厂没有在车间所有卫生间放置厕纸和洗手皂。管理者代表表示工厂对提供的设施检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为提供了干净的厕所和清洗设施。这局部符合BSCI CoC要求。

PA 12: Protection of the Environment

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

Question: 12.2 Is there satisfactory evidence that the auditee has procedures in place to ensure integration of local environmental law into the business model?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on management and worker interviews, document review and onsite observation, the factory developed the Protection of the Environment procedures, assigned factory manager to take charge of the whole environment protection issues. However, there was finding which was not fully in compliance with the law requirements regarding EIA and approval. The question is rated as partially because the factory complies with local regulations in most areas of environment protection. The management declared that they would take measures to meet all requirements of local laws as soon as possible. This is partially in compliance with requirements of relevant local environment protection laws. (Please refer to question points PA12.3 for specific environment protection regulations.)	根据管理层和员工访谈，文件审核和现场观察发现，工厂有制定环境保护程序文件并指派厂长负责环保事宜。然而，还存在环评和批复方面不符合法规要求的问题。此问题点判定为局部符合原因在于工厂在大多数的环保领域符合当地法规的要求。工厂管理层表示会采取措施尽快符合所有的法规要求。这部分遵循了当地环境保护方面的法规。（具体的环境保护法规条款请参阅PA12.3）

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on on-site observation, interview with management and workers and documents review, it was noted that the factory did not provide EIA and approval from local environment department. The management representative declared they did not inspect and review environmental protection enough and failed to identify problems in a timely manner. The question is rated as no because the factory had no environmental protection permit. This is not in compliance with the PRC Environmental Impact Assessment Law Article 16 and 22.	根据现场审核、与管理层和工人的访谈以及文件审查，发现工厂提供环境影响评估报告和当地环保部门审批。管理者代表表示工厂对环保检查和评审不足，未能及时发现问题。该问题被评为不符合，因为工厂没有环保方面的许可。这不符合《中华人民共和国环境影响评价法》第16和22条。

PA 13: Ethical Business Behaviour

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-002182-002

Question: 13.4 Is there satisfactory evidence that the auditee collects uses and otherwise processes personal information with reasonable care and in accordance with privacy and information security laws and regulatory requirements?

ENGLISH

LOCAL LANGUAGE

Finding

Based on management and worker interviews and documents review it was identified that, the factory's established information safety procedure did not contain the collection, use and processing of personal information according to legal requirements. The management representative declared they did not inspect and review information safety enough and failed to identify problems in a timely manner. The question is rated as partially because the factory did not face any threats due to the defectiveness of information safety procedure. This is partially in compliance with PRC Personal Information Protection Law Article 51.

根据管理层和员工访谈和文件查看发现，工厂建立的信息安全程序未包含以法规要求的方式对个人信息进行收集、使用和处理。管理者代表表示工厂对信息安全检查和评审不足，未能及时发现问题。该问题被评为部分符合，因为工厂并未因信息安全程序不完善遭受任何威胁。这局部符合《中华人民共和国个人信息保护法》第51条。