

Monitored Party xxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd.	amfori ID 156-008834-000	Address xxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxx China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Follow-up Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 30/07/2025	Closing Meeting Finished Date 30/07/2025	Submission Date 04/08/2025
Expiration Date 21/08/2026	Announcement Type Semi Announced	
Site xxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd.	Site amfori ID 156-008834-002	

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	C	
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	A	
PA 13: Ethical Business Behaviour	A	

## GENERAL DESCRIPTION

Name of lead auditor: Gary Lu; APSCA membership number: CSCA 21701886.

Monitoring partner name: TUV Rheinland.

Audit schedule details: The audit is planned for 1 auditor x 1 day.

Announcement Type: Semi Announced. This follow-up monitoring only covered PA1, PA2, PA3, PA5, PA6 and PA7. The rating and evidence of the rest PAs kept the same as the latest audit.

Business partner information:

The auditee was founded in 2001. The auditee was located at xx China / 中国xx。

The main products manufactured by the auditee was notebook; the main production processes included plate making, paper cutting, PU cutting, printing, laminating, die cutting, gold stamping, punching, folding, stitching, sewing, gluing, inspection and packing.

The auditee finished all production processes within own production area, no production process sub-contracted, and there was no service sub-contracted. All workers of the auditee were hired by the auditee directly. There was no obvious off or peak season in past one year.

Audited location information:

The factory occupied four 2-storey buildings, two 1-storey buildings, one 4-storey building, and one 5-storey (with basement) building with a total construction area of 23,555.3 square meters.

The details are as follows:

Building #1: one 2-storey production building, 3,940 square meters, the 1F was used as the printing, laminating, folding and stitching workshops, the 2F was used as the PU cutting, sewing and packing workshops.

Building #2: one 2-storey production building, 3,980 square meters, the 1F was used as the paper cutting, die cutting, gold stamping, punching and gluing workshops, the 2F was used as warehouse, inspection and packing workshops.

Building #3: one 2-storey production building, 3,960 square meters, the 1F was used as warehouse and the plate making workshop. the 2F was used as warehouse.

Building #4: one 2-storey dormitory building, 1,930 square meters, the 1F and 2F were used as dormitory rooms.

Building #5: one 4-storey complex building, 3,800 square meters, the 1F was used as office, kitchen and canteen, the 2F was used as office, the 3F and 4F were used as dormitory rooms. Building #6: one 5-storey (with basement) warehouse building, 5,515.3 square meters, the basement was used as fire protection control room, the 1F to 5F were used as warehouses. Building #7: one 1-storey warehouse building, 280 square meters, used as raw material warehouse.

Building #8: one 1-storey warehouse building: 150 square meters, used as chemical warehouse and printing equipment storage area.

The auditee did not provide transportation to workers.

Operating shifts and hours:

Working hour for canteen staff: 09:00-13:00, 14:00-18:00. The security guards work in two shifts: 07:00-15:00; 15:00-23:00; For the rest workers: 07:30-11:30, 13:00-17:00, and overtime from 18:00 to 20:00 if busy. The time records of 10 sampled workers from July 2024 to 30 July 2025 were reviewed (time records of July 2024 only used for payroll check); as per time records review and interview, the workers overtime maximum 2 hours overtime per day, maximum 18 hours overtime per week. the maximum monthly overtime reached 64 hours.

Time recording system:

The auditee used fingerprint or face detecting attendance system to record workers working hour.

Salary payment details:

The payroll of ten sampled workers from July 2024 to June 2025 were reviewed; as per payrolls check and interview, the auditee paid lowest wage was RMB20 per hour. The auditee paid wages to worker by bank transfer before 25th of following month.

Worker number information:

- Total worker number: 205 (included 172 production workers and 33 non-production workers).

- Production worker number: 172 production workers, included 85 male workers and 87 female workers.
  - Domestic migrant workers: 104 (included 50 male workers and 54 female workers).
- There was no pregnant, disabilities, young, foreign migrant employee in the factory at current.

Good practices: The auditee provided free meals, and free dormitory to workers.

Worker organization details:

There were 2 worker representatives in the factory; the worker representatives were elected by workers in 2025.

Circumstances:

The management was positive and cooperative. There was no special circumstance during the audit.

Summary of findings:

Overall, the most clauses of amfori BSCI was implemented effectively by the auditee, however, partial findings need to improve by the auditee; such as:

PA1 Insufficient CSR management system; insufficient production capacity plan.

PA2 The main auditee defined long-term goals for protecting workers, however, the auditee did not regularly evaluate the achievement of the target, and no evaluation records on the achievement of the target for review; some interviewed workers did not aware of amfori BSCI code of conduct; insufficient grievance mechanism.

PA5 Insufficient social insurance.

PA6 Monthly overtime hours exceeded legal requirement.

PA7 Insufficient management on OHS (such as mechanical safety, the kitchen did not retain the food samples).

Living wage calculation: #LivingWage:

- 1). No anker wage available for the producer's location, so we used the data provided by auditing company.
- 2). The calculation methodology refers to anker living wage structure.
- 3). The data comes from the local bureau of statistics for the current year.

Attachment:

1. 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.
2. Follow documents were not available during the audit:
  - A. There were no Collective Bargaining agreements in the factory, which makes the Collective Bargaining agreements not applicable;
  - B. There was no contractor used by the auditee, which makes the Contractor license not applicable;
  - C. The factory did not obtain the Government Waivers in past one year, which makes the Government Waivers not applicable;
  - D. There were no agencies used by the auditee, which makes the agency labor contract not applicable.
  - E. PA12 was not rated, which makes the environmental documents not applicable.

## SITE DETAILS

Site

XXXXXXXXXXXXXXXXXXXXXXXXXXXXX  
Co., Ltd.

Site amfori ID

156-008834-002

## GICS Classification

Sector

## Materials

Industry Group

## Materials

Industry

## Paper & Forest Products

Sub Industry

## Paper Products

## amfori Process Classifications

## Printing

## 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	205	Workers
Legal minimum wage in local currency	2,010	Monthly
Lowest wage paid for regular work at the site	3,480	Monthly
Calculated living wage in local currency	2,838.2	Monthly
Total sample	10	Workers

## Other Metrics

Male workers	103	Workers
Female workers	102	Workers
Non-binary workers	0	Workers
Permanent workers - Male	103	Workers
Permanent workers - Female	102	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	5	Workers
Management - Female	5	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	50	Workers
Domestic migrant workers - Female	54	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers



## FINDINGS



### PA1: Social Management System

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx | Site amfori ID: 156-008834-002

**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
<b>Finding</b>	
<p>The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, and site observation, the auditee management system could not implement amfori BSCI effectively caused there was gap to respect amfori BSCI COC;</p> <p>1. the factory did not control the overtime hours effectively caused monthly overtime exceeded 36 hours systematically;</p> <p>2. partial findings in PA2, PA5 and PA7 were not corrected yet.</p> <p>3. as per management interview, the management was aware of amfori BSCI COC and related local laws, but the auditee could not be implemented partial requirements according to amfori BSCI COC completely during the operating, the management claimed that the auditee would improve these findings to reach amfori BSCI COC requirements step by step.</p> <p>It violated the requirements of amfori BSCI system manual.</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，被审核方的管理系统未能有效的去执行amfori BSCI行为守则导致对于遵守amfori BSCI行为守则仍然有差距；</p> <p>1.被审核方没有对加班时间进行有效的控制导致月加班系统性超出36小时；</p> <p>2.PA2、PA5和PA7有部分问题没有得到改善；</p> <p>3.根据管理层访谈，管理层对当地的法规和amfori BSCI有了解，但被审核方在运行中有部分要求未能完全按照amfori BSCI的行为守则来执行，管理层表示被审核方会逐步改善发现的问题来达到amfori BSCI行为守则的要求。</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
<b>Finding</b>	
<p>The auditee partially respected this principle, because based on management, worker interview, and documents review, the management was aware of the workforce planning and cost accounting, and the auditee collected the data about worker force, material cost etc., but during the actual operation, the auditee could not control the monthly overtime hours effectively caused the workers' monthly overtime exceeded the law requirement (the local law regulated that the</p>	<p>被审核方部分遵守该原则，因为基于管理层和工人访谈、和文件审查，管理层有了解产能规划和成本核算，同时工厂收集了人力，物料等成本等，但是在实际运行中，被审核方未能有效的控制月加班时间导致员工的月加班时间超出法律的要求（当地法规规定月加班不超过36小时）。</p> <p>违反了amfori BSCI系统手册中的要求。</p>



### Finding

monthly overtime not exceed 36 hours).  
It violated the requirements of amfori BSCI system manual.

## PA 2: Workers Involvement and Protection

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd. | Site amfori ID: 156-008834-002

**Question:** 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

### ENGLISH

### LOCAL LANGUAGE

### Finding

The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, the main auditee defined long-term goals for protecting workers, however, the auditee did not regularly evaluate the achievement of the target, and no evaluation records on the achievement of the target for review. The auditee representative stated that they had not improve this issue yet. It violated the requirements of amfori BSCI system manual.

被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查，工厂制定保护工人的长期目标，但没有定期评估目标的达成情况，没有评估目标的记录给查阅。被审核方代表表示他们还没有改善这个问题。  
违反了amfori BSCI系统手册中的要求。

**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

The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, and site observation, 3 out of 10 interviewed workers did not aware of amfori BSCI code of conduct, such as Workers Involvement and Protection, the amfori BSCI COC in local language was posted in the workshop for worker study, and the auditee provided the amfori BSCI code of conduct training to workers, but the training was not effective entirely, some interviewees stated it easily to forget it after training. It violated the requirements of amfori BSCI system manual.

被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，被访谈的10员工有3个不了解amfori BSCI行为守则，例如工人参与和保护。工厂里张贴了当地语言的amfori BSCI行为守则给员工学习，被审核方给员工进行了amfori BSCI行为守则的培训，但是培训没有完全有效，部分被访谈员工陈述培训后容易忘记。  
违反了amfori BSCI系统手册中的要求。

**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**

The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, and site observation, the grievance mechanism was not including all interested parties, only for internal part. Although the grievance procedure provided by the auditee mentioned anonymous complain was collected by suggestion box, no any grievance record was collected in the recent one year and the auditee did not make investigation about that. Besides, although the grievance procedure provided by the factory mentioned anonymous complain was collected by suggestion box, auditors found that the suggestion box to be set at the smoking room, which could not help workers to make complains or suggestions in private or anonymous; and the suggestion box guidelines were not posted on site for staff to read. The auditee representative stated that because busy on production task, they had not improved these issues yet. It violated the requirements of amfori BSCI system manual.

被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，申诉机制没有包含所有利益相关方，只是对工厂内部适用。工厂虽然建立了匿名的申诉渠道，但是工厂近一年未收集到任何申诉记录，工厂并未开展任何调查。此外，尽管工厂提供了申诉机制表示员工可以通过意见箱进行申诉，但是审核员发现意见箱设置在吸烟室，无法确保员工申诉的隐私性，且意见箱的指引文件未在现场张贴供员工参阅。被审核方代表表示因为忙于生产任务，他们还没有改善这些问题。违反了amfori BSCI系统手册中的要求。

**PA 5: Fair Remuneration**

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd. | Site amfori ID: 156-008834-002

**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**

The auditee did not respect this principle, because based on management, worker interview, and documents review, the social insurance did not cover 100% workers. There were 205 workers in the factory, included 64 retired workers and no new workers joined the factory after July 2025; so, 141 workers could participate in social insurance at current. As per reviewed past 12 months social insurance receipts, based on the last receipt in June 2025

被审核方未遵守该原则，因为基于管理层和工人访谈、和文件审查，社保没有覆盖到100%的员工。被审核方有205个员工，包括64个是退休员工和2025年7月后没有新的员工入厂，因此，当前有141个员工可以购买社保。根据查阅过去一年的社保凭证，基于2025年6月的社保凭证和工厂代表确认，被审核方没有给141位员工中的37名员工提供养老保险，失业保险，生育保险和医疗保险。被审核方给能够购买工伤保险的178位员工(包括37

Finding

and confirmed with factory representative, the auditee did not purchase endowment insurance, unemployment insurance, child-birth insurance, and medical insurance to 37 out of 141 workers.

The auditee provided injury insurance to 178 workers (included 37 retired workers) who could participate in injury insurance.

The auditee provided commercial Insurance to all retired workers who could not participate in injury insurance, it was valid from 16 August 2024 to 15 August 2025.

As per interview, the management and interviewed workers stated that partial workers unwilling to participate in social insurance.

The interviewees claimed that partial workers purchased new agricultural insurance at their home town, but the auditee could not provide evidence for this issue.

Reference to Social Insurance Law of the People Republic of China, Article 10, 23, 44 and 53.

个退休的员工)提供工伤保险。

被审核方给所有购买不了工伤保险的退休员工提供了商业保险，有效期从2024年8月16日到2025年8月15日。

根据访谈，管理层和被访谈的员工表示有部分员工不愿意购买社保。被访谈的人表示部分人在老家有买新农保，但是被审核方未能提供相应的证据。

参考《中华人民共和国社会保险法》第10条、第23条，第44条和第53条。

PA 6: Decent Working Hours

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd. | Site amfori ID: 156-008834-002

**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

The auditee did not respect this principle, because based on management, worker interview, and based on reviewing of the attendance records from 01 August 2024 to 30 July 2025, the monthly overtime hours of sampled workers exceeded 36 hours.

As per randomly selected of 3 months samples (10 sampled workers for each sampled month) for review,

1. In October 2024, 8 sampled workers monthly overtime hours were 52 hours, the rest 2 sampled workers monthly overtime hours were 32 hours (the monthly overtime of these 2 sampled workers not exceed 36 hours);

2. In March 2025, 8 sampled workers monthly overtime hours were 64 hours, the rest 2 sampled workers monthly overtime hours were 40 hours;

被审核方未遵守该原则，因为基于管理层和工人访谈以及基于查阅2024年8月1日至2025年7月30日的考勤，员工的月加班时间超过36小时。

随机抽取的3个月的考勤样本 (每个抽样月抽取10个员工样本) 进行查阅，

1.在2024年10月，8个抽样员工月加班为52小时、剩下的2个抽样员工月加班为32小时 (这两个抽样员工的月加班未超36小时) ；

2.在2025年3月，8个抽样员工月加班为64小时、剩下的2个抽样员工月加班为40小时 ；

3.在2025年6月，8个抽样员工月加班为60小时、剩下的2个抽样员工月加班为32小时 (这两个抽样员工的月加班未超36小时) ；。

4.截至2025年7月30日，抽样员工在2025年7月的最大月加班时间达到64小时。

5.根据管理层访谈，他们表示由于生产任务繁忙，被审核方没有有效控制加班导致这个问题。

Finding	
<p>3. In June 2025, 8 sampled workers monthly overtime hours were 60 hours, the rest 2 sampled workers monthly overtime hours were 32 hours (the monthly overtime of these 2 sampled workers not exceed 36 hours).</p> <p>4. Until 30 July 2025, the maximum monthly overtime time of sampled workers reached 64 hours in July 2025.</p> <p>5. As per management interview, the auditee representative claimed because busy on production tasks, so the auditee did not control monthly overtime.</p> <p>6. As per worker interview, the interviewees stated that the overtime were voluntary in the factory, and workers had one day off per week.</p> <p>Reference to PRC Labour Law article 41.</p>	<p>6.根据员工访谈，被访谈的员工表示加班是自愿的，每周有一天休息。</p> <p>参考《中华人民共和国劳动法》第41条。</p>

## PA 7: Occupational Health and Safety

Site: xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx Co., Ltd. | Site amfori ID: 156-008834-002

**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>The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, and site observation, the auditee had established a management system on health and safety; but the auditee implemented inefficiently in few areas, it caused there were few findings found in this performance area, such as mechanical safety issue.</p> <p>It violated the requirements of amfori BSCI system manual.</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，被审核方建立健康安全管理体系，但由于有少部分未能有效的执行导致本章节还有问题出现，如机械安全问题。</p> <p>违反了amfori BSCI系统手册中的要求。</p>

**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 auditee partially respected this principle, because based on management interview, worker</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，被审</p>

Finding	
<p>representative and worker interview, documents review, and site observation, it was identified that the factory had established the management procedure on equipment safety, and there were specialists responsible for checking and maintaining the machinery and equipment, the most machines (such as special machines, and the most production machines) were maintained in safe condition; however, there were no protective guards installed on the exposed pulley wheels of the two punching machines in the punching workshop, nor nine punching machines were there foot pedal safety devices; two sewing machine in the sewing workshop did not have protective guard on the exposed lower and upper pulley wheels, and without needle guard.</p> <p>Reference to General rules for designing the production facilities in accordance with safety and health requirements (GB5083-1999) article 6.1.6.</p>	<p>核方有建立机器设备安全管理程序，有专员负责机器设备检查和维护，大部分设备（如特种设备，大部分生产设备）维护在良好的状态，然而，冲压车间的2台冲压机没有为外露的皮带轮安装保护罩，且9台没有安装脚踏防护装置。缝纫车间2台缝纫机没有为外露的上、下皮带轮安装保护罩，也没有针挡。</p> <p>参考《生产设备安全卫生设计总则》（GB5083-1999）第6.1.6条。</p>

**Question:** 7.21 Is there satisfactory evidence that the auditee provides workers with access to an appropriate, clean area for storing food, eating and/or cooking?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially respected this principle, because based on management interview, worker representative and worker interview, documents review, and site observation, there were more than 100 employees ate in the canteen; but the kitchen did not retain the food samples.</p> <p>The auditee representative claimed that they had ignored this requirement, and they will improve it soon.</p> <p>Reference to catering and mass meal delivery hygiene requirement, Article 35.</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈，工人和工人代表访谈、文件审查和现场观察，工厂有超100人在餐厅就餐；但是食堂没有对食物留样。被审核方的代表表示他们忽视了这个要求，他们会尽快改善这个问题。</p> <p>参考餐饮业和集体用餐配送单位卫生规范第三十五条。</p>