

Monitored Party <b>XXXXXXXXXXXXXXXXXXXXX Co., Ltd.</b>	amfori ID <b>156-001843-000</b>	Address <b>XXXXXXXXXXXXXXXXXXXXX China</b>
		Monitoring Partner <b>TUV Rheinland</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Submission Date <b>16/09/2025</b>
Monitoring Start Date <b>08/09/2025</b>	Closing Meeting Finished Date <b>10/09/2025</b>	
Expiration Date <b>16/09/2026</b>	Announcement Type <b>Semi Announced</b>	
Site <b>XXXXXXXXXXXXXXXXXXXXX Co., Ltd.</b>	Site amfori ID <b>156-001843-002</b>	

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## OVERALL RATING



## SECTION RATING

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

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

## GENERAL DESCRIPTION

Name of lead auditor: Daniel Mo; APSCA membership number: CSCA 21700032

Monitoring partner name: TUV Rheinland

Audit schedule details: The audit was planned for 1 auditor x 2.5 days.

Announcement Type: Semi-announced.

Business partner information:

The auditee was found on 19 November 2009. The auditee was located at XXXXXXXXXXXXXXXXXXXXXXXXXXXX China. (中国XXXXXXXXXXXXXXXXXXXXXXXXX). The auditee mainly produced bags. The production processes in the factory included cutting, sewing, inspection and packing. No production process was subcontracted to outsource.

Audited location information:

There were 3 main buildings within the audited site, total areas occupied by the auditee were around 20000m<sup>2</sup>, building details as below: One 1-storey warehouse building. One 4-storey building was used dormitory, canteen and kitchen. One 3-storey (partial 4-storey) building was used as office, workshop and warehouse (1F for warehouse, cutting and packing workshop, 2F for sewing and packing workshop, 3F for sample making room, warehouse and office, 4F for exhibition room). All site buildings were rented from Landlord. The auditee provided the lease contract for review. The landlord had no production in this area. No other company was in the same site.

Operating shifts and hours:

The factory established the policy of working hours. Workers worked 8 hours per day, 5 days per week. Working hour for guards was: 08:00-16:00, 16:00-24:00, 00:00-08:00. Working hour for canteen staff was: 06:30-12:30, 14:00-18:00(2 hours as overtime). Working hour for the other workers was: 07:30-11:30, 13:00-17:00, if necessary overtime starts from 17:00 to 19:00. Saturday was arranged as overtime, Sunday was guaranteed as the rest day. Attendance records from 1 August 2024 to audit day of 18 workers were randomly selected. Maximum overtime was 2 hours per day, maximum overtime was 16 hours per week, maximum overtime was 74 hours per month. Workers worked overtime voluntarily.

Time recording system: Face scan system was used to record the working hour.

Salary payment details: The worker wage was calculated by hourly rate and paid by bank transfer at the end of next month.

Worker number information:

There were 147 production employees(31 males and 116 females) and 27 non-production employees in the factory. 135 employees were local permanent employees and 39 employees were domestic migrant employees(17 males and 22 females). All employees were hired by the factory directly. No foreign migrant, young, pregnant, seasonal, temporary, disabled, home-based workers was used in the auditee.

Good practices: Free meal and dormitory were provided to workers free of charge.

Worker organization details: There was no labor union in the factory. Workers freely elected worker representatives. The management held meetings with worker representatives regularly.

Circumstances: The auditee management was cooperative throughout the audit. The auditor did worker interview and took photos freely and the auditee agreed the findings and signed the CAP. There was no special circumstance during the audit.

Summary of findings:

PA1: Some procedures were not implemented, Production capacity not effectively executed.

PA2: Workers did not understand the content of amfori BSCI

PA5: Not all employees participate in social insurance

PA6: Excessive monthly overtime

PA7: No needle guards, no label

Living wage calculation:

#Living Wage:

- 1).No anker wage available for the producer 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.a)No contractor was used by the auditee, which makes the contractor license/permit not applicable; b)No agency was used by the auditee, which makes the agency labour contract not applicable; c)No government waiver such as Comprehensive Working Hours System waiver or social insurance waiver was obtained by the auditee, which makes the government waiver not applicable; d)No collective bargain agreements existed in the factory, which makes the collective bargain agreements not applicable.
- 2.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 had been obtained the individual's consent during the audit.

## SITE DETAILS

Site  
**XXXXXXXXXXXXXXXXXXXXXXXXXX**  
XXX Co., Ltd.

Site amfori ID  
**156-001843-002**

### GICS Classification

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Sector	Industry Group	Industry
<b>Consumer Discretionary</b>	<b>Consumer Durables &amp; Apparel</b>	<b>Textiles, Apparel &amp; Luxury Goods</b>

Sub Industry  
**Apparel, Accessories & Luxury Goods**

### amfori Process Classifications

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Sewing / Stitching

### GS1 Classifications

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N.A.

### NACE Classification

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Tanning and dressing of leather; manufacture of luggage, handbags, saddlery and harness; dressing and dyeing of fur

### Water Stress Situation

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This site is not located in a water stressed region

# METRICS

## Key Metrics

Total workforce	174	Workers
Legal minimum wage in local currency	2,260	Monthly
Lowest wage paid for regular work at the site	2,262	Monthly
Calculated living wage in local currency	2,854.22	Monthly
Total sample	18	Workers

## Other Metrics

Male workers	47	Workers
Female workers	127	Workers
Non-binary workers	0	Workers
Permanent workers - Male	47	Workers
Permanent workers - Female	127	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	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	4	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	17	Workers
Domestic migrant workers - Female	22	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	127	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	13	Workers
Sample - Non-binary	0	Workers

# FINDINGS



## PA1: Social Management System

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXX Co., Ltd. | Site amfori ID: 156-001843-002

**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 respect to this principle, based on document review, onsite observation, management and employee interview, the factory established amfori BSCI procedures, but did not fully implemented, for example, not all employees participated in five types of social insurances in PA5, overtime exceeded 36 hours per month in PA6. The management stated that social insurance purchasing was voluntary and overtime was not controlled. Workers stated that they worked overtime and purchased social insurance voluntarily. (In accordance with the requirements in the amfori BSCI system manual)</p>	<p>被审核方部分遵守该原则，根据文件审阅、现场观察、管理层和员工访谈，工厂建立了amfori BSCI程序，但是没有完全地实施，比如PA5中5险没有全员参与，PA6中月加班超出36小时。管理层表示社保自愿参与，加班时间没有管控。员工表示他们自愿加班，社保自愿参与。(根据amfori BSCI系统手册的要求)</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 respect to this principle, based on document review, management interview, the factory has established capacity planning procedure, but did not have complete capacity plan which led to monthly overtime exceeded. The management stated that they did not control the monthly overtime. (In accordance with the requirements in the amfori BSCI system manual)</p>	<p>被审核方部分遵守该原则，根据文件审阅、管理层访谈，工厂建立了产能规划程序，但是没有完善的产能计划以致于月加班超时。管理层表示没有管控月加班时间。(根据amfori BSCI系统手册的要求)</p>



## PA 2: Workers Involvement and Protection

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXX Co., Ltd. | Site amfori ID: 156-001843-002

**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
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**Finding**

The auditee partially respect to this principle, based on document review, management and workers interview, the factory established training procedure and provided amfori BSCI training to workers, COC was posted on-site, but 50% of the interviewed workers did not understand the content of amfori BSCI, such as fair remuneration. The management stated that they will strengthen training.(In accordance with the requirements in the amfori BSCI system manual)

被审核方部分遵守该原则，根据文件审阅、管理层和员工访谈，工厂建立了培训程序，给员工提供了amfori BSCI培训，现场张贴了行为守则，但访谈的50%的员工不了解amfori BSCI内容，例如公平报酬等。管理层表示会加强培训。（根据amfori BSCI系统手册的要求）

**PA 5: Fair Remuneration**

Site: XXXXXXXXXXXXXXXXXXXXXXXXXX Co., Ltd. | Site amfori ID: 156-001843-002

**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 partially respect to this principle, based on document review, management and employee interview, insufficient social insurance participated. The auditee had 174 workers, and 52 of them were retired workers, no new employee. According to the social insurance platform records of August 2025, in the rest 122 workers, the factory did not purchase maternity insurance, medical insurance, unemployment insurance, retirement insurance, for 7 workers; injury insurance for 1 worker. Through management interview, some workers were not willing to purchase the social insurance. (Reference law: Social Insurance Law of the People's Republic of China, Article 10, 23, 33,44, 53)

Remark:

- 1. 52 out of the 174 employees had reaching retirement age, social insurance was not required by laws.
- 2. The factory told workers the benefits of social insurance while recruiting and asked them to buy, but employees were not willing to purchase the social insurance.
- 3. Through workers interview, some workers purchased the new rural medical insurance, but the factory did not provide relevant supporting documents.
- 4. All workers were provided with employer liability insurance(valid from 12 June 2025 to 11 June

被审核方部分遵守该原则，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174名员工，其中有52名退休返聘员工，无新进员工。2025年8月社保记录显示在剩余的122名员工中，有7名员工没有购买医疗、生育、养老、失业保险；有1名员工没有购买工伤保险。管理层访谈得知，有些员工不愿购买。（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）

备注：

- 1.该174名员工中有52名已达到退休年龄，按照法规要求不需要购买社保。
- 2.招聘时工厂已告知员工社保的好处，让其购买，但是员工不愿购买。
- 3.通过员工访谈，部分员工购买了新农保，但是工厂没有提供相关的证明文件。
- 4.工厂给所有员工购买了雇主责任险（有效期自2025年6月12日至2026年6月11日，90人）和团体人身险（有效期自2025年6月8日至2026年6月7日，97人）。

**Finding**

2026, 90 workers) and group personal insurance(valid from 8 June 2025 to 7 June 2026, 97 workers).

**PA 6: Decent Working Hours**

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXX Co., Ltd. | Site amfori ID: 156-001843-002

**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 to this principle, based on document review, management and employee interview, monthly overtime hours exceeded the legal requirement, the factory did not have effective overtime control system. The factory management stated that they did not control the monthly 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 August 2024 to 10 September 2025, details of sampled months as below:

In November 2024: 18 out of 18 sampled workers' monthly OT exceeded 36 hours and were 74 hours;  
 In April 2025: 18 out of 18 sampled workers' monthly OT exceeded 36 hours and were 56 hours;  
 In July 2025: 18 out of 18 sampled workers' monthly OT exceeded 36 hours and were 68 hours;  
 (Reference Law: PRC Labour Law article 41).

Remark:  
 Till to the audit day, the monthly overtime hours of 18 out of 18 randomly selected employees was 16 hours in September 2025.

被审核方未遵守该原则，根据文件审阅，管理层和员工访谈，月加班时间超过法规要求，工厂没有有效的系统去控制加班。工厂管理层表示没有管控好月加班时间。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8月1日至2025年9月10日的考勤记录，抽样月份的情况如下：

2024年11月：18名抽样员工中的18名的月加班超36小时，为74小时；  
 2025年4月：18名抽样员工中的18名的月加班超36小时，为56小时；  
 2025年7月：18名抽样员工中的18名的月加班超36小时，为68小时；  
 （参考法律法规：中华人民共和国劳动法第41条）  
 备注：  
 至审核当天，18名员工考勤显示，18名员工2025年9月加班16小时。

**PA 7: Occupational Health and Safety**

Site: XXXXXXXXXXXXXXXXXXXXXXXXXXXX Co., Ltd. | Site amfori ID: 156-001843-002

**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>The auditee partially respect to this principle, based on site observation, management and workers interview, the factory has established chemical management procedure, but no label was available for sewing oil in 2F sewing workshop. The management stated that the amount of chemicals used was low, and it was specifically managed by mechanics. Reference law: Regulations on Safety Use of Chemicals in Workplaces, Article 12</p>	<p>被审核方部分遵守该原则，根据现场查看，管理层和员工访谈，工厂建立了化学品管理程序，但是2楼缝纫车间使用的衣车油没有张贴标识。管理层表示化学品用量少，由机修工专门负责管理。参考法律法规：工作场所安全使用化学品规定 第十二条。</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 respects this principle, based on document review, onsite observation, management and employee interview, the factory established the procedure on equipment management, but 20% sewing machines in 2F sewing workshop were not equipped with needle guards. Ref Law: Article 6.1.2 General rules of design on health and safety of production facility. The management stated that no injury was happened.</p>	<p>被审核方部分遵守该原则，根据文件审阅，现场查看，管理层和员工访谈，工厂建立了设备管理制度，但是2楼缝纫车间20%的缝纫机没有安装针挡。参考法规：生产设备安全卫生设计总则，第6.1.2条。管理层表示没有工伤发生。</p>