

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:

- Q: Enabling accurate Assessment
- 1: Employment is Freely Chosen
- 1.A: Responsible Recruitment & Entitlement to Work
- 2: Freedom of Association and Right to Collective Bargaining are Respected
- 4: Child Labour Shall Not be Used
- 5: Legal Wages are Paid
- 5.A: Living Wages are Paid
- 6: Working Hours are Not Excessive
- 7: No Discrimination is Practiced
- 8: Regular Employment is Provided
- 8.A: Sub-contracting and Homeworkers are Used Responsibly
- 9: No Harsh or Inhumane Treatment is Allowed

2. Health & Safety Code Area:

- 3: Working Conditions are Safe and Hygienic

3. Environment Code Area:

- 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas

- As 2-pillar

2. Health & Safety Code Area

- As 2-pillar

3. Environment Code Area:

- 10.A: Environment 2-Pillar
- 10.B: Environment 4-Pillar

4. Business Ethics Code Area:

- 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC1046451	Auditor company name	BUREAU VERITAS CPS – ASIA
Date of audit	2025-01-06	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	XXXXXXXX	Site name	XXXXXXXXXXXXXXXXXXXX
Business name	XXXXXXXXXXXXXXXXXXXX	Site address	XXXXXXXXXXXXXX, CN
Site phone	XXXXXXXXXXXX	Site email	XXXXXXXXXXXXXX

Audit parameters

Time in and out	Day 1		Day 2		Day 3	
	In	09:00	In	09:00	In	08:00
	Out	17:00	Out	17:00	Out	12:00
Audit type	Periodic					
Was the audit announced?	Semi announced					
Was the Sedex SAQ available for review?	Yes					
Who signed and agreed CAPR?	XXXXXXXX / Administration Manager					
Any conflicting information SAQ/Pre-Audit Info	No					
Is further information available?	No					

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	N/A. Worker representative was present. No union in the factory.		
Reason for absence during the audit	N/A. Worker representative was present. No union in the factory.		
Reason for absence at the closing meeting	N/A. Worker representative was present. No union in the factory.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post - audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e. g. different sample size)

This audit includes elements beyond the scope of a Social Compliance Audit as defined by the APSCA Competency Framework. The association of the auditor's APSCA number with this report is limited to those elements outlined in the APSCA Competency Framework. APSCA makes no representations with respect to the auditor's competency to professionally evaluate compliance with any other audit elements.

Lead auditor

Sherry Jiang

APSCA Number

21701319

Additional auditor

Date of declaration

2025-01-08

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	XXXXXXXX
Title	Administration Manager
Date of declaration	2025-01-08

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3. N Maintain a log of all hazardous substance...		NC ZAF600759264
	3. N Maintain a log of all hazardous substance...		NC ZAF600759265
	3. H Where identified as necessary to reduce r...		NC ZAF600759266
	3. O Implement an appropriate electrical safet...		NC ZAF600759267
	3. M Ensure all machinery is installed, mainta...	§ 1	NC ZAF600773499
	3. N Maintain a log of all hazardous substance...	§ 2	NC ZAF600773501
	3. N Maintain a log of all hazardous substance...	§ 3	NC ZAF600773502
	3. H Where identified as necessary to reduce r...	§ 4	NC ZAF600773506
6. Working hours are not excessive	6. F Ensure that where overtime is used, it is...		NC ZAF600759268
	6. F Ensure that where overtime is used, it is...	§ 5	NC ZAF600773503
0. Enabling accurate assessment	0. C Provide an accurate site description and ...		GE ZAF600773498
5. Legal wages are paid	5. B Ensure that workers receive the insurance...	§ 6	NC ZAF600773500
10. B. Environment 4-Pillar	10. B. E Identify and monitor potential negativ...		GE ZAF600773504
	10. B. E Identify and monitor potential negativ...		GE ZAF600773505

Local law issues

§ 1	<p>根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。根据《生产设备安全卫生设计总则(GB5083-1999)》第6.3 过冷与过热，若生产设备的灼热或过冷部位可能造成危险，则必须配置防接触屏蔽。</p> <p>In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices. Article 6.3 of Code of Design of Manufacturing Equipment Safety and Hygiene, for supercooling and overheating, if the hot or supercooled parts of the production equipment may cause danger, they must be equipped with anti-contact shielding.</p>
§ 2	<p>根据《工作场所安全使用化学品规定》第14条：(1)使用单位购进的化学品需要转移或分装到其他容器时，应标明其内容。对于危险化学品，在转移或分装后的容器上应贴安全标签；(2)盛装危险化学品的容器在未净化处理前，不得更换原安全标签。</p> <p>In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed.</p>
§ 3	<p>根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。</p> <p>In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antisepsis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.</p>
§ 4	<p>根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。</p> <p>In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.</p>

§ 5

根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：（一）退休；（二）患病、负伤；（三）因工伤残或者患职业病；（四）失业；（五）生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。

根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。

In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.

The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.





































In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium.

§ 6

根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。

In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1. A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



















Fundamental improvements required



Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8. A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10. A. Environment 2-Pillar				
10. C. Business ethics				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC1046451	
Sedex site reference	XXXXXXXXXXXXXXXXXX	
Company name	XXXXXXXXXXXXXXXXXXXX	
Business ownership type	GOODS	
Site name	XXXXXXXXXXXXXXXXXXXX	
Site name in local language	XXXXXXXXXXXXXXXXXXXX	
GPS location	GPS address	XXXXXXXXXXXXXXXXXXXXXXXXXXXX
	Coordinates	XXXXXXXXXXXXXXXXXXXXXXXXXXXX
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	XXXXXXXXXXXX
	Job title	Administration Manager
	Phone number	XXXXXXXXXXXXXXXXXXXX
	Email	XXXXXXXXXXXXXXXXXXXX
Applicable business and other legally required business license numbers and documents	XXXXXXXXXXXXXXXXXXXX	

Site activities

Site function	Factory Processing/Manufacturer
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Site activities

Site activities	Primary	Manufacture of computers and peripheral equipment
	Secondary	
	Other	
Product type	Paper products (e. g. note book, diary book, photo album, folder, calendar etc.)	
Process overview	The main products were paper products (e.g. note book, diary book, photo album, folder, calendar etc.). The production processes were plastic cover molding, cutting, printing, laminating, hot stamping, die cutting, bookbinding, varnishing, inspection and packing. Production line: 30 lines. The main equipment were plastic cover molding machines, cutting machines, printing machines, laminating machines, hot stamping machines, die cutting machines, bookbinding machines, varnishing machines etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	70617m ²	
Building 1	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	7
	Description of floor activities	1F-7F: Dormitory room.
Building 2	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	1
	Description of floor activities	1F: Eating area and kitchen.

Site scope

Building 3	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	5
	Description of floor activities	1F-5F: Office.
Building 4	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	5
	Description of floor activities	1F: Warehouse. 2F: Printing workshop. 3F: Cutting workshop. 4F: Development room. 5F: Plastic cover molding workshop.
Building 5	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	3
	Description of floor activities	1F: Show room. 2F: Printing workshop and inspection workshop. 3F: Warehouse.
Building 6	Last construction works on site	2003
	If building is shared, provide details	N/A. No shared building.
	Number of floors	4
	Description of floor activities	1F: Warehouse. 2F: Laminating workshop, hot stamping workshop, die cutting workshop and varnishing workshop. 3F: Bookbinding workshop. 4F: Packing workshop.
Building 7	Last construction works on site	2018
	If building is shared, provide details	N/A. No shared building.
	Number of floors	1
	Description of floor activities	1F: Die cutting workshop, bookbinding workshop and packing workshop.

Site scope

Is there any difference between the site scope of the audit and the Sedex site profile? No

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? No

Is any activity conducted onsite not included within the scope of the audit? No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? Yes

Is the accommodation within the perimeter of the site audited? Onsite

Is the accommodation contractually mandated for workers? Optional

Who provides the accommodation? Site

Was all accommodation (whether directly or via third parties, off or onsite) included in this audit? All
All accommodation was included in this audit.

Do children also live in the accommodation? No

Does the site organise worker transport to the worksite? Not applicable
The site did not organize worker transport to the worksite.

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%
Is there any night or back shift work at the site?	<p>Yes</p> <p>There were 2 shifts for printing workers, shift 1: 08:00-12:00, 13:00-17:00; shift 2: 20:00-24:00, 01:00-05:00.</p>			
What percentage of the workforce, including temporary and agency workers, work during the night/ back shift?	11%			
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	<p>No</p> <p>The audit time period was from 09:00 to 17:00 on January 6, 2025, 09:00 to 17:00 on January 7, 2025 and 08:00 to 12:00 on January 8, 2025, so the audit did not conduct across all shift times. Auditor selected 5 representative shift workers to review their attendance records, payroll records, personnel files and employment contracts. Besides, these 5 shift workers were interviewed.</p>			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	<p>ISO 14001 (Environmental management), Other certification</p> <p>ISO 9001 and FSC certificate.</p>			
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	<p>No</p> <p>The factory did not assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community and there was no legal requirement.</p>			
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	<p>No</p> <p>The factory did not conduct HRIA and there was no legal requirement.</p>			

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	263 (57.3%)	196 (42.7%)	- -	459 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	263 (57.3%)	196 (42.7%)	- -	459 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	205 (44.7%)	152 (33.1%)	- -	357 (77.8%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	205 (44.7%)	152 (33.1%)	- -	357 (77.8%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Jiangxi Province, Hubei Province, Guizhou Province etc.

Workers by age

	Men	Women	Other	Total
18 – 24 years old	36 (7.8%)	26 (5.7%)	- -	62 (13.5%)
15 – 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

No
N/A. The peak season was not obvious.

Describe how this may vary during peak periods

Please list the nationalities of all workers, with the three most common nationalities listed first

Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	57%	43%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	263 (57.3%)	196 (42.7%)	- -	459 (100%)
Salaried workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	263 (57.3%)	196 (42.7%)	- -	459 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

N/A. No other payment cycle.

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	20 (4.4%)	3 (0.7%)	- -	23
Supervisors or team leaders	5 (1.1%)	2 (0.4%)	- -	7
Administrative staff	3 (0.7%)	3 (0.7%)	- -	6

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Group interviews Individual interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-
Were any of the audit findings attributable to the survey?				
Was the interview sample representative of all types of nationality and employment types of workers?	Yes			
Was the interview sample representative of the gender composition of the workforce?	Yes			
Number and size of group interviews	Workers interviewed by group: 4 group of 5 employees. Workers interviewed by individual: 6 employees.			
Did workers understand the purpose of the audit?	Yes			
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes			
Was there any indication that workers had been ‘coached’ in how they should respond to questions?	No			
What was the general attitude of the workers towards their workplace?	Favorable			

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No significant concerns or complaints noted during the interview.
What did the workers like the most about working at this site?	Other (provide details) Workers did not represent what was they like the most about working at this site, they though it was a common works and no significant defect in this factory.
Additional comments	26 workers were randomly selected from all departments for private interview or group interview. In general, the attitude of workers was favourable. Workers said that the factory management treated them friendly, and they were satisfied with their working environment, payment and working time. The interview responses were coincident with the management interview and what the records showed. Apart from 26 workers interviewed listed in the worker analysis table, another 2 workers were interviewed for business ethics and 2 workers for environment as this is a 4-pillar audit.
Attitude of workers' committee/union representatives	The worker' s committee had a positive attitude to management, workplace, and the interview process. Worker representatives represented that factory management provided support such as meeting rooms and time for the committee.
Attitude of managers	At the opening meeting, auditor explained the audit scope and the audit standard to the factory representative. Factory tour, document review, interviews of management members and workers were conducted as scheduled. A full audit was finished under the co-operation with the factory representatives. During the factory tour, auditor was allowed to access the whole factory area. Factory management also allowed auditor to select the samples, review documents, and interview production workers in a private and confidential manner.

Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	15	5	–	20
Workers interviewed individually	3	3	–	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	13	7	–	20
International migrant workers interviewed	0	0	–	0
Total migrant workers interviewed	13	7	–	20

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	5.0%	5.0%	-	5.0%
Last full calendar year (2024)	5.0%	5.0%	-	5.0%
Previous full calendar year (2023)	5.0%	5.0%	-	5.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2) * number available workdays in the year * 100

Are accidents recorded? Yes

 No accident had happened.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
0. Enabling accurate assessment	0.C Provide an accurate site description and ...		GE ZAF600773498
Systems and evidence examined to validate this code section	<p>Current systems: The factory allowed auditor to conduct and complete the audit without obstruction and provided auditor with genuine and authentic records. The factory did not offer bribes to or threaten the auditor. The factory provided an accurate site description and Sedex site profile declared prior to or during the audit. The factory maintained a written human rights policy statement that is approved at the most senior level, communicated to all personnel, and trained to relevant personnel.</p> <p>Evidence examined: 1. The written human rights policy, training records etc. 2. Management and workers' interview.</p>		

Findings: good examples

ZAF600773498

Good example

Code area
0 Enabling accurate assessment

Workplace requirement
0.C Provide an accurate site description and Sedex site profile declared prior to or during the audit.

Description
审核员发现工厂获得ISO9001:2015证书，有效期为2024年3月22日到2027年4月21日。工厂提供了ISO9001:2015证书供查阅。
It was noted that the factory had obtained the ISO9001:2015 certificate, which was valid from March 22, 2024 to April 21, 2027. ISO9001:2015 certificate was provided for review.

Evidence



[ISO9001 certificate.JPG](#) [🔗](#)

0. Enabling accurate assessment

Data points

Has the site received an official notice, No
fine, prosecution, or withhold release
order (WRO) for non-compliance with
legislation, regulation, consent, or permits
within the last three years, relating to
Health and Safety, labour rights or the
environment?

Did any workers selected by the auditor No
decline to be interviewed?

Were sufficient documents for non- No
employee (e.g. agency or other
subcontracted) workers available for
review?

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established anti-force labor policy. The policy states that all force labor situation like prison labor, withhold certificate shall be prohibited. Through the factory management and workers' interview, it was noted that XXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current systems:
The factory established a policy to ensure employment is freely chosen. The policy included the following clause:
1. The factory does not require deposit or withhold employees' ID cards.
2. The factory does not limit the employees' freedom.
3. There is no forced, bonded or involuntary prison labour.
4. Employees are free to leave their employer after reasonable notice.

Evidence examined:
1. Personnel files (all were checked).
2. Resignation records.
3. Factory rules.
4. Employee handbook.
5. Management and workers' interview.

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1. A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established recruitment policy and human rights policy. The policy states the recruitment process. Through the factory management and workers' interview, it was noted that XXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems: Work performed was on the basis of recognized employment relationship established through national law and practice. It was noted that the factory had signed the labour contracts with all sampled workers, which was confirmed through the employee interview, personal files kept in site. Workers did not need to pay any fee during recruitment process. No agency worker, contractor worker, homeworker used in site.</p> <p>Evidence examined: 1. Management and workers' interview. 2. Records of contract and personal file.</p>		

1. A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A – Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	78%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Jiangxi Province, Hubei Province, Guizhou Province etc.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	<p>No</p> <p>N/A. Workers represented that they did not need to paid any fees or costs during recruitment process.</p>

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established freedom of association policy, no CBA signed between workers and managements in site. The policy states that workers have freedom of association and right to collective bargaining. Through the factory management and workers' interview, it was noted that XXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these policies.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <p>There was worker committee in the factory. Suggestion box was used for employees to put forward any idea. The right to freedom of association and collective bargaining was only restricted under law, the employer facilitates. According to workers interview, they were free to join organizations of their own choice, the factory management recognized and respected their rights to freedom of association and collective bargaining, and workers were not subject to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization.</p> <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Management and workers' interview. 2. Records from the worker committee. 3. Suggestions from the suggestion box and actions taken. 		

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context? Yes

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Not Applicable

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? Yes

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

The factory established health and safety policies in site like machine safety, PPE using, emergency procedure, fire safety etc. The policies required factory to make sure workers health and safety were suitable in site. Through the factory management and workers' interview, it was noted that XXXXXXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees, safety training also provided. Internal audit and management review conducted in site to make sure to compliance with these polices. But there were some findings found in this section, auditor believe that the monitor of this part required fundamental improvements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3. N Maintain a log of all hazardous substance...		NC ZAF600759264
	3. N Maintain a log of all hazardous substance...		NC ZAF600759265
	3. H Where identified as necessary to reduce r...		NC ZAF600759266
	3. O Implement an appropriate electrical safet...		NC ZAF600759267
	3. M Ensure all machinery is installed, mainta...	§1	NC ZAF600773499
	3. N Maintain a log of all hazardous substance...	§2	NC ZAF600773501
	3. N Maintain a log of all hazardous substance...	§3	NC ZAF600773502
	3. H Where identified as necessary to reduce r...	§4	NC ZAF600773506

Systems and evidence examined to validate this code section

Current systems:

The general working conditions were safety and factory management was aimed at improving a safer and healthier working environment. Pre-job training and PPE training were provided regularly. Drinking water in each workshop. HS management checked HS issue regularly. Legal construction safety documents were provided for review and 3rd party structural engineer evaluation was not provided, and it was not required by local law. The most recent two fire drill dates in the factory were June 20, 2024 and December 19, 2024.

Evidence examined:

1. Factory tour.
2. Document review (O-chart of safety committee, safety procedures, emergency preparedness, first aid responder certificates, fire drill records, safety training records, special operation certificate, safety inspection documents for special equipment etc.).
3. Management and workers' interview.

Findings: non-compliances

ZAF600759264

Non-compliance

Due 2022-02-05

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-08)*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

233 - Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

Verification method

Desktop audit

Area of non-compliance/non-conformance

Description

No local law was showed. This NC is closed, a new NC with local law has been raised to replace this one.

审核员发现工厂印刷车间20/120罐正在使用的盛装油墨的容器没有张贴安全标签。

It was noted that 20 out of 120 printing ink containers being used in the printing workshop were not posted with the safety labels.

Description (carried over)

Description of non-compliance: 1 NC against ETI 1 NC against Local Law 0 NC against customer code: It was noted that printing ink containers being used in the printing workshop were not posted with safety labels. Local law: In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed. ETI Requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Recommended corrective action: It is recommended that management adopt practices and controls to ensure that all hazardous chemicals stored or being used in the factory is posted with safety labels. Objective evidence observed: Per factory tour, please refer to non-compliance photo No. 1

Corrective and preventative actions

This NC is closed, a new NC with local law has been raised to replace this one.

建议所有在工厂内储存和使用的危险化学品都有张贴安全标签，标签的内容要完整。

It is recommended that management adopt practices and controls to ensure that all hazardous chemicals stored or being used in the factory is posted with the safety labels.

Corrective and preventative actions (carried over)

N/A

Evidence



No safety label. JPG



* PDF generated at 08:28 (UTC) on 24 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600759265

Non-compliance

Due 2022-02-05

Code area	Status
3 Working conditions are safe and hygienic	Closed (2025-01-08)*
Workplace requirement	Time given to resolve
3. N Maintain a log of all hazardous substances (e. g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.	30 days
Issue title	Verification method
240 – No/inadequate safety measures/anti-explosion measures for chemicals (e. g. no anti-leaking system/secondary container/unbundled)	Desktop audit
Description	Area of non-compliance/non-conformance
No local law was showed. This NC is closed, a new NC with local law has been raised to replace this one.	
审核员发现工厂印刷车间20/120罐正在使用的盛装油墨的容器没有设置防渗漏设施/二次容器。	
It was noted that there was no anti-leakage facility (e. g. secondary container) for 20 out of 120 printing ink containers being used in the printing workshop.	

Description (carried over)

Description of non-compliance: 1 NC against ETI 1 NC against Local Law 0 NC against customer code: It was noted that there was no anti-leakage facility (e.g. secondary container) in the printing workshop and laminating workshop for printing ink and glue. Local law: In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antiseptis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof. ETI Requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Recommended corrective action: It is recommended that management adopt practices and controls to ensure that the anti-leakage facility (e.g. secondary container) is used for printing ink and glue. Objective evidence observed: Per factory tour, please refer to non-compliance photo No. 2

Corrective and preventative actions

This NC is closed, a new NC with local law has been raised to replace this one.

建议工厂为所有的危险化学品容器设置防渗漏设施/二次容器。

It is recommended that management adopt practices and controls to ensure that the anti-leakage facility (e.g. secondary container) is used for all hazardous chemical containers.

Corrective and preventative actions (carried over)

N/A

Evidence



[No secondary container. JPG](#) [🔗](#)

* PDF generated at 08:28 (UTC) on 24 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600759266

Non-compliance

Due 2022-02-05

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-08)*

Workplace requirement

3. H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Time given to resolve

30 days

Issue title

278 – Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Verification method

Desktop audit

Area of non-compliance/non-conformance

Description

No local law was showed. This NC is closed, a new NC with local law has been raised to replace this one.

审核员发现工厂塑料壳成型车间2/20名接触噪声的塑料壳成型员工没有佩戴工厂提供的耳塞。

It was noted that 2 out of 20 plastic cover molding employees who were in contact with noise in the plastic cover molding workshop did not wear the provided earplugs.

Description (carried over)

Description of non-compliance: 1 NC against ETI 1 NC against Local Law 0 NC against customer code: It was noted that employees in the printing workshop did not wear rubber gloves provided by factory management. Local law: In accordance with Article 42 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use. ETI Requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Recommended corrective action: It is recommended that management adopt practices and controls to ensure that necessary personal protective equipments are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately. Objective evidence observed: Per factory tour, please refer to non-compliance photo No.3

Corrective and preventative actions

This NC is closed, a new NC with local law has been raised to replace this one.

建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。

It is recommended that management adopt practices and controls to ensure that necessary personal protective equipment are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately.

Corrective and preventative actions (carried over)

N/A

Evidence



[Plastic cover molding employee did not wear the provided earplugs. JPG](#)



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ZAF600759267

Non-compliance

Due 2022-02-05

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-08)*

Workplace requirement

3.0 Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Time given to resolve

30 days

Issue title

225 - No/inadequate PAT/electric safety testing/electrical safety risk assessment

Verification method

Desktop audit

Description

审核员发现工厂调墨房内安装的所有开关均为防爆的。

Area of non-compliance/non-conformance

It was noted that all switches in the printing ink mixing room were explosive-protected.

Description (carried over)

Description of non-compliance: 1 NC against ETI 1 NC against Local Law 0 NC against customer code: It was noted that switches in the printing ink mixing room were not explosive-protected. Local law: In accordance with Article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, fire-fighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightning-proof, static-proof, antiseptic, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof. ETI Requirement: 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Recommended corrective action: It is recommended that management adopt practices and controls to ensure that switches in the printing ink mixing room stored inflammable and explosive chemical with volatility are explosive-protected. Objective evidence observed: Per factory tour, please refer to non-compliance photo No. 4

Corrective and preventative actions

N/A

Corrective and preventative actions (carried over)

N/A

Evidence



[Explosive-proofed switch.JPG](#)



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ZAF600773499

Non-compliance

Due 2025-02-14

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-23)*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

264 – Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Description

审核员发现工厂缝制车间1/1台正在使用的高头车没有安装护目挡板。

Area of non-compliance/non-conformance

Local law

It was noted that 1 out of 1 high head sewing machine being used in the sewing workshop was not equipped with eye protection shield.

Base code

Corrective and preventative actions

建议工厂为该台高头车安装护目挡板。

It is recommended that management adopt practices and controls to ensure that this high head sewing machine is equipped with eye protection shield.

Local law reference

根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。根据《生产设备安全卫生设计总则(GB5083-1999)》第6.3 过冷与过热，若生产设备的灼热或过冷部位可能造成危险，则必须配置防接触屏蔽。

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices. Article 6.3 of Code of Design of Manufacturing Equipment Safety and Hygiene, for supercooling and overheating, if the hot or supercooled parts of the production equipment may cause danger, they must be equipped with anti-contact shielding.

Evidence



[No eye protection shield.JPG](#) 

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ZAF600773501

Non-compliance

Due 2025-02-14

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-24)*

Workplace requirement

3. N Maintain a log of all hazardous substances (e. g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

233 - Hazardous substances (e. g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

Verification method

Desktop audit

Description

审核员发现工厂印刷车间20/120罐正在使用的盛装油墨的容器没有张贴安全标签。

Area of non-compliance/non-conformance

Local law

Base code

It was noted that 20 out of 120 printing ink containers being used in the printing workshop were not posted with the safety labels.

Corrective and preventative actions

建议所有在工厂内储存和使用的危险化学品都有张贴安全标签，标签的内容要完整。

It is recommended that management adopt practices and controls to ensure that all hazardous chemicals stored or being used in the factory is posted with the safety labels.

Local law reference

根据《工作场所安全使用化学品规定》第14条：(1)使用单位购进的化学品需要转移或分装到其他容器时，应标明其内容。对于危险化学品，在转移或分装后的容器上应贴安全标签；(2)盛装危险化学品的容器在未净化处理前，不得更换原安全标签。

In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place: (1) In case of transferring or loading the chemicals purchased into a new container, it is required to mark clearly the descriptions of these chemicals on the newly adopted container. As to those hazardous chemicals that have been transferred or loaded into a new container, it is necessary to stick a safety precautions mark on the new container. (2) The original safety precautions mark upon those containers that contain hazardous chemicals shall not be replaced before these containers have been cleansed.

Evidence



No safety label.JPG



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ZAF600773502

Non-compliance

Due 2025-02-14

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-01-24)*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbunded)

Area of non-compliance/non-conformance

Local law

Base code

Description

审核员发现工厂印刷车间20/120罐正在使用的盛装油墨的容器没有设置防渗漏设施/二次容器。

It was noted that there was no anti-leakage facility (e.g. secondary container) for 20 out of 120 printing ink containers being used in the printing workshop.

Corrective and preventative actions

建议工厂为所有的危险化学品容器设置防渗漏设施/二次容器。

It is recommended that management adopt practices and controls to ensure that the anti-leakage facility (e.g. secondary container) is used for all hazardous chemical containers.

Local law reference

根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。

In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antiseptis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.

Evidence



No secondary container.JPG [🔗](#)

* PDF generated at 08:28 (UTC) on 24 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600773506	Non-compliance	Due 2025-02-14
Code area	Status	
3 Working conditions are safe and hygienic	Closed (2025-01-23)*	

Workplace requirement

3. H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Time given to resolve

30 days

Issue title

278 – Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Verification method

Desktop audit

Description

审核员发现工厂塑料壳成型车间2/20名接触噪声的塑料壳成型员工没有佩戴工厂提供的耳塞。

Area of non-compliance/non-conformance

Local law

Base code

It was noted that 2 out of 20 plastic cover molding employees who were in contact with noise in the plastic cover molding workshop did not wear the provided earplugs.

Corrective and preventative actions

建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。

It is recommended that management adopt practices and controls to ensure that necessary personal protective equipment are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately.

Local law reference

根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。

In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.

Evidence



[Plastic cover molding employee did not wear the provided earplugs. JPG](#)



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3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Workers would handle and have access to hazardous substances (e.g. printing ink etc.)
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite) Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable After the initial construction of the buildings, the factory did not add any additional floors.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established anti child labor and young worker protection policies in site. The policies required factory to make sure no child used in site and protect young workers even there was no actual young worker in site. Through the factory management and workers' interview, it was noted that XXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section

Current systems:

1. The factory establishes a policy that will never employ and use any child labour under the age of 16 years old.
2. The factory will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files.
3. Sufficient numbers of employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth.
4. The employees between 16 to 18 years old would be registered to the Department of Labour.

Evidence examined:

1. Policies review.
2. Documents review (personal files etc.).
3. Management and workers' interview.

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger 13%

Enter the legal age of employment 16

Enter the age of the youngest worker identified 19

Enter the number of workers under local legal minimum age 0

Enter the number of workers under 15 years old 0

Percentage of workers that are apprentices, trainees or interns 0%

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? No

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

The factory established wage related policies in site. The policies required factory to make sure workers' wage should be compliance with legal requirements and provided benefits as legal requirement. Through the factory management and workers' interview, it was noted that XXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices. But there was one finding found in this section, auditor believe that the monitor of this part required fundamental improvements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5. B Ensure that workers receive the insurance...	§ 1	NC ZAF600773500

Systems and evidence examined to validate this code section

Current systems:

Auditor reviewed the attendance records and payroll records of 26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024. Employees were paid 150% of normal wage for overtime wage worked on weekdays, 200% of normal wage for overtime wage worked on rest days. And no one worked on statutory holidays. All sampled employees minimum wage were paid at RMB11.26 per hour, which met the local minimum wage standard of RMB11.26 per hour (since April 1, 2022).

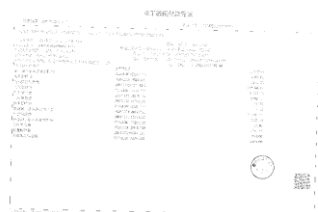
According to the social insurance payment receipt provided by factory management, it was noted that only 369 out of 495 employees were provided with pension, unemployment, medical and maternity insurance, 440 out of 495 employees were provided with accident insurance in December 2024. Remark: The factory provided commercial insurance for 57 employees with the valid period from March 9, 2024 to March 8, 2025.

Evidence examined:

1. Documents review (Payroll records, attendance records, social insurance payment receipt etc.)
2. Management and workers' interview.

Findings: non-compliances

ZAF600773500		Non-compliance	Due 2025-03-16
Code area	Status		
5 Legal wages are paid	Open*		
Workplace requirement	Time given to resolve		
5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.	60 days		
Issue title	Verification method		
423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	Follow up audit		
Description	Area of non-compliance/non-conformance		
审核员发现工厂的社会保险覆盖不足。根据厂方提供的2024年12月社会保险缴费单据显示工厂仅为369/495名员工提供养老，失业，医疗和生育保险，为440/495名员工提供工伤保险。备注：工厂为57名员工提供了商业保险，有效期为2024年3月9日到2025年3月8日。	Local law		
It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt provided by factory management, it was noted that only 369 out of 495 employees were provided with pension, unemployment, medical and maternity insurance, 440 out of 495 employees were provided with accident insurance in December 2024. Remark: The factory provided commercial insurance for 57 employees with the valid period from March 9, 2024 to March 8, 2025.	Base code		
Corrective and preventative actions			
建议工厂为员工提供所有法定的社会保险福利。			
It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements.			
Local law reference			
根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：（一）退休；（二）患病、负伤；（三）因工伤残或者患职业病；（四）失业；（五）生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。			
根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。			
In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.			
The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.			
In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium.			
Evidence			



[Insufficient social insurance coverage.PNG](#)



* PDF generated at 08:28 (UTC) on 24 Jan 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience Wages meet a living wage The legal minimum wage
Does the site use digital payment methods (i. e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
--	----------------

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	168.0

Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	20.0
	Max hours per month	92.0
Minimum legal wage	Min per hour	11.26
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	1960.0
Actual minimum wage	Actual per hour	11.26
	Actual per day	90.0
	Actual per week	450.0
	Actual per month	1960.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024.

Are there different legal minimum/ legally recognised CBAs wage grades? No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs? Above legal minimum

Indicate the breakdown of workforce per earnings 0 % of workforce earning under minimum wage, 100 % of workforce earning minimum wage, 0 % of workforce earning above minimum wage.

Are there any bonus schemes used? No

Were accurate records shown at the first request? Yes

Were any inconsistencies found? No

5. A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: Factory had collected information about workers' expenditure on food, clothing, shelter, transportation, supporting the old and raise a child, then calculated the living wage standard (RMB2500 per month). Auditor reviewed the attendance records and payroll records of 26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024. All sampled employees minimum total wage were paid at RMB3321 per month, which was above the living wage standard.</p> <p>Evidence examined: 1. Documents review (Payroll records, attendance records etc.). 2. Management and workers' interview.</p>		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

The factory established working hour related policies in site. The policies required factory to make sure workers' attendance should be compliance with legal requirements. Through the factory management and workers' interview, it was noted that XXXXXXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these policies. But there was one finding found in this section, auditor believe that the monitor of this part required fundamental improvements.

Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6. F Ensure that where overtime is used, it is...		NC ZAF600759268
	6. F Ensure that where overtime is used, it is...	§1	NC ZAF600773503
Systems and evidence examined to validate this code section	<p>Current systems: Through employees' interview, overtime is voluntary. Auditor reviewed the attendance records of 26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024. It was noted that the maximum overtime working hours for sampled employees were 2 hours on the normal working day, 20 hours per week and 92 hours per month. Further, the maximum weekly working hours for sampled employees were 60 hours and the maximum consecutive days for them were 6 days.</p> <p>Evidence examined: 1. Time records. 2. Management and workers' interview.</p>		

Findings: non-compliances

ZAF600759268

Non-compliance

Due 2022-03-07

Code area

6 Working hours are not excessive

Status

Closed (2025-01-08)*

Workplace requirement

6. F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

60 days

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Verification method

Follow up audit

Area of non-compliance/non-conformance

Description

No local law was showed. This NC is closed, a new NC with local law has been raised to replace this one.

根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。

审核员从厂方提供的工资记录中抽取78个样本（其中从2024年2月抽取26个，从2024年6月抽取26个和从最近工资支付月份2024年11月抽取26个），发现共有52名员工加班时间超出了法定标准，具体为：

- 26/26名员工在2024年6月的加班时间为88小时，超过每月加班时间不能超过36小时的法律规定；
- 26/26名员工在2024年11月的加班时间为92小时，超过每月加班时间不能超过36小时的法律规定。

It was noted that 52 out of 78 sample population employees worked in excess of the statutory overtime hour limits.

A review of 78 sample population employees' time records (26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024) yielded the following:

- 26 out of 26 sample population employees worked in excess of 36 overtime hours per month (i.e. 88 hours) in June 2024, which was not in compliance with the legal requirement;
- 26 out of 26 sample population employees worked in excess of 36 overtime hours per month (i.e. 92 hours) in November 2024, which was not in compliance with the legal requirement.

Description (carried over)

Description of non-compliance: 1 NC against ETI 1 NC against Local Law 0 NC against customer code: It was noted that 114 out of 126 sample population employees worked in excess of the statutory overtime hour limits. A review of 126 sample population employees' time records (42 samples from March 2021, 42 samples from September 2021 and 42 samples from current month November 2021) yielded the following: • 38 out of 42 sample population employees worked in excess of 36 overtime hours per month (i.e. 66 hours) in March 2021, which was not in compliance with the legal requirement; • 38 out of 42 sample population employees worked in excess of 36 overtime hours per month (i.e. 66 hours) in September 2021, which was not in compliance with the legal requirement; • 38 out of 42 sample population employees worked in excess of 36 overtime hours per month (i.e. 78 hours) in November 2021, which was not in compliance with the legal requirement. Local law: In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed. ETI: 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. Recommended Corrective Action: It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. Objective evidence observed: Per working hour testing

Corrective and preventative actions

This NC is closed, a new NC with local law has been raised to replace this one.

建议工厂确保员工的加班时间符合法律要求。

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits.

Corrective and preventative actions (carried over)

N/A

Evidence

3030-19-01	8730	12:03	13:00	13:03	13:30	21:00
3030-19-02	8730	12:03	13:00	13:03	13:30	21:03
3030-19-03						
3030-19-04	8730	12:03	13:00	13:03	13:30	21:00
3030-19-05	8730	12:03	13:00	13:03	13:30	21:03
3030-19-06	8730	12:03	13:00	13:03	13:30	21:03
3030-19-07	8730	12:03	13:00	13:03	13:30	21:03
3030-19-08	8730	12:03	13:00	13:03	13:30	21:03
3030-19-09	8730	12:03	13:00	13:03	13:30	21:03
3030-19-10						
3030-19-11	8730	12:03	13:00	13:03	13:30	21:03
3030-19-12	8730	12:03	13:00	13:03	13:30	21:03
3030-19-13	8730	12:03	13:00	13:03	13:30	21:03
3030-19-14	8730	12:03	13:00	13:03	13:30	21:03
3030-19-15	8730	12:03	13:00	13:03	13:30	21:03
3030-19-16	8730	12:03	13:00	13:03	13:30	21:03
3030-19-17	8730	12:03	13:00	13:03	13:30	21:03
3030-19-18	8730	12:03	13:00	13:03	13:30	21:03
3030-19-19	8730	12:03	13:00	13:03	13:30	21:03
3030-19-20	8730	12:03	13:00	13:03	13:30	21:03
3030-19-21	8730	12:03	13:00	13:03	13:30	21:03
3030-19-22	8730	12:03	13:00	13:03	13:30	21:03
3030-19-23	8730	12:03	13:00	13:03	13:30	21:03
3030-19-24	8730	12:03	13:00	13:03	13:30	21:03
3030-19-25	8730	12:03	13:00	13:03	13:30	21:03
3030-19-26	8730	12:03	13:00	13:03	13:30	21:03
3030-19-27	8730	12:03	13:00	13:03	13:30	21:03
3030-19-28	8730	12:03	13:00	13:03	13:30	21:03
3030-19-29	8730	12:03	13:00	13:03	13:30	21:03
3030-19-30	8730	12:03	13:00	13:03	13:30	21:03

[Overtime in excess of legal requirement. jpg](#) 

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ZAF600773503

Non-compliance

Due 2025-03-16

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement 6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.	Time given to resolve 60 days
Issue title 480 – Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)	Verification method Follow up audit
Description 根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。 审核员从厂方提供的工资记录中抽取78个样本（其中从2024年2月抽取26个，从2024年6月抽取26个和从最近工资支付月份2024年11月抽取26个），发现共有52名员工加班时间超出了法定标准，具体为： • 26/26名员工在2024年6月的加班时间为88小时，超过每月加班时间不能超过36小时的法律规定； • 26/26名员工在2024年11月的加班时间为92小时，超过每月加班时间不能超过36小时的法律规定。 It was noted that 52 out of 78 sample population employees worked in excess of the statutory overtime hour limits. A review of 78 sample population employees’ time records (26 samples from February 2024, 26 samples from June 2024 and 26 samples from most recent paid month November 2024) yielded the following: • 26 out of 26 sample population employees worked in excess of 36 overtime hours per month (i.e. 88 hours) in June 2024, which was not in compliance with the legal requirement; • 26 out of 26 sample population employees worked in excess of 36 overtime hours per month (i.e. 92 hours) in November 2024, which was not in compliance with the legal requirement.	Area of non-compliance/non-conformance Local law Base code
Corrective and preventative actions 建议工厂确保员工的加班时间符合法律要求。 It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits.	
Local law reference 根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。 In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.	
Evidence	



[Overtime in excess of legal requirement.jpg](#)

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6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A. Employees were paid 150% of normal wage for overtime wage worked on weekdays, 200% of normal wage for overtime wage worked on rest days. And no one worked on statutory holidays.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	59.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established anti-discrimination policy in site. The policies stated that factory would not discriminate workers. Through the factory management and workers' interview, it was noted that XXXXXXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems: Based on the review of factory regulations and employee private interview, no discrimination was noted regarding hiring, job assignment, wages, bonus, allowance, promotion, discipline, work assignment, gender, age and nationality. All sampled employees interviewed stated that they were treated fairly and compensated the same wage for the same job.</p> <p>Evidence examined: 1. Management and workers' interview. 2. Factory regulations.</p>		

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e. g. where specific qualifications are needed, such as engineer/laboratory analyst)?	10%
Representation of women in managerial roles (ratio of women workers to women managers)	1%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	1%
Three most common nationalities in managerial and supervisory roles	All managements and owner in the factory were Chinese.

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established fair employment policy in site. The policies stated that factory would employ and treat employees unprejudiced. Through the factory management and workers' interview, it was noted that XXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. Work performed is on the basis of recognized employment relationship established through national law and practice. 2. It was noted that the factory had signed the labour contracts with all sampled workers, which was confirmed through the employee interview. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Personnel files and labour contracts review. 2. Management and workers' interview. 		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8. A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established supplier management policy in site. The policies stated that factory check the suppliers' social responsible performance, no subcontractor and homeworker noted during this audit. Through the factory management and workers' interview, it was noted that XXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory did not use subcontractors for process or production. The factory did not use homeworkers. All manufacturing was done within the site.</p> <p>Evidence examined: 1. Production documents and production process documents review. 2. Factory tour. 3. Management and workers' interview.</p>		

8. A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	–	–	–	–

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
Factory had conducted quick assessment on their suppliers to make sure no homeworker used by their suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
There were no concerns.

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established no harsh or inhumane treatment policy in site. The policies stated that factory would not harsh or abuse workers. Through the factory management and workers' interview, it was noted that XXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these policies

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory and the disciplinary procedure of the factory is verbal warning and education.</p> <p>Evidence examined: 1. Policies review. 2. Management and workers' interview.</p>		

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	Suggestion box installed in factory for workers to complaint as a grievance mechanism.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10. A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Robust Management Systems

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

The factory established environment protection policy in site. The policies stated that factory would follow the local environment law and requirements. Through the factory management and workers' interview, it was noted that XXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these policies.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current systems:

1. The factory established the environment policies and procedures to ensure meeting applicable environmental laws.
2. All necessary documentation on environmental protection was provided.
3. Designated personnel was responsible for environment issues.
4. Environment trainings were provided to employees regularly.
5. Environment laws collection in the factory was update timely.
6. Waste handling records were provided for review.

Evidence examined:

1. Factory tour.
2. Environment policies and procedures.
3. Legal required environmental certificates.
4. Waste collection records.
5. Environment training records.

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, No
fine or prosecution for any non-
compliances with environmental
legislation, regulation, consent or permits
(within the last three years)?

Does the site have any valid
environmental or energy management
certificates?

It was noted that the factory had obtained the ISO14001:2015 certificate, which was valid from May 6, 2022 to April 13, 2025. ISO14001:2015 certificate was provided for review.

Are there any other sustainability
certifications present (e.g. Forest
Stewardship Council (FSC), Marine
Stewardship Council (MSC)?

Yes

It was noted that the factory had obtained the FSC certificate, which was valid from July 6, 2020 to July 5, 2025. FSC certificate was provided for review.

Has the site implemented or made plans No
to implement any adaptive measures to
protect workers from the impact of
climate change?

10. B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
10. B. Environment 4-Pillar	10. B. E Identify and monitor potential negativ...		GE ZAF600773504
	10. B. E Identify and monitor potential negativ...		GE ZAF600773505
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. The factory established the environment policies and procedures to ensure meeting applicable environmental laws. 2. All necessary documentation on environmental protection was provided. 3. Designated personnel was responsible for environment issues. 4. Environment trainings were provided to employees regularly. 5. Environment laws collection in the factory was update timely. 6. Waste handling records were provided for review. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Factory tour. 2. Environment policies and procedures. 3. Legal required environmental certificates. 4. Waste collection records. 5. Environment training records. 		

Findings: good examples

ZAF600773504

Good example

Code area

10.B Environment 4-Pillar

Workplace requirement

10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Description

审核员发现工厂获得ISO14001:2015证书，有效期为2022年5月6日到2025年4月13日。工厂提供了ISO14001:2015证书供查阅。

It was noted that the factory had obtained the ISO14001:2015 certificate, which was valid from May 6, 2022 to April 13, 2025. ISO14001:2015 certificate was provided for review.

Evidence



[ISO14001 certificate.JPG](#)



ZAF600773505

Good example

Code area

10.B Environment 4-Pillar

Workplace requirement

10.B.E Identify and monitor potential negative environment impacts of operations and supply chain and have in place systems that prevent, mitigate or remedy the impacts of their own operations.

Description

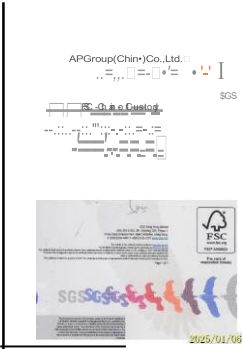
审核员发现工厂获得FSC证书，有效期为2020年7月6日到2025年7月5日。工厂提供了FSC证书供查阅。

It was noted that the factory had obtained the FSC certificate, which was valid from July 6, 2020 to July 5, 2025. FSC certificate was provided for review.

ZAF600773505

Good example

Evidence



[FSC certificate.jpg](#)

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Switching to renewable energy sources Packaging optimization Circular economy and resource efficiency Zero-waste and recycling protocols Sustainable material sourcing Biodiversity and eco system impact management Responsible use and management of water Prioritising local suppliers
Is there a system for managing client' s requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The factory had set up a procedure and policy to meet the client' s requirement that regarding the environmental and chemical issues.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs) Yes, to increase low-carbon energy consumption or production Yes, a net-zero target Yes, other climate-related target
Are any of these science-based targets?	Yes, approved by the Science Based Targets initiative (SBTi)
Does the site have reduction targets in place for environmental aspects (e. g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Per document review, the factory had reduction targets in place for environmental aspects e. g. water consumption and discharge, waste, energy and green-house gas emissions.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes Supplier inspection records were provided for review.

Usage/discharge analysis

Last full calendar year (2024)

Previous full calendar year (2023)

Total electricity consumption from non-renewable sources (kWh)	9,269,678	9,268,561
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	Nil	Nil
Has the site completed any carbon footprint analysis?	No	No
Water sources	Municipal water	Municipal water
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	32,690	32,016
Water discharged	Municipal wastewater treatment	Municipal wastewater treatment
Water volume discharged (m3)	27,786	27,213
Water volume recycled (m3)	0	0
Total waste produced (mt)	150	145
Total hazardous waste produced (mt)	10	9
Waste to recycling (mt)	140	136
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	103,000,000	100,000,000

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	The factory established business ethics policy in site. Through the factory management and workers' interview, it was noted that XXXXXXXXXX/Administration Manager was assigned to responsible for this part and social responsible requirements issues and policies trainings were provided to all employees. Internal audit and management review conducted in site to make sure to compliance with these polices.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. Facility had access to a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 2. Facility had a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice. 3. Facility had a designated person responsible for implementing standards concerning Business Ethics. <p>Evidence examined:</p> <p>All documents about Business Practice were provided and checked.</p>		

10. C. Business ethics

Data points

Has the site received an official notice, No
fine or prosecution for any non-
compliances with business ethics
legislation, regulation, consent or permits
(within the last three years)?

Provide any certified anti-bribery
management systems for the site

There were no certified anti-bribery Management Systems for the site.

Attachments



[Factory name.JPG](#)



[Factory gate.JPG](#)



[Dormitory building.JPG](#)



[Office building.JPG](#)



[Production building.JPG](#)



[Plastic cover molding workshop.JPG](#)



[Cutting workshop.JPG](#)



[Printing workshop.JPG](#)



[Laminating workshop.JPG](#)



[Hot stamping workshop.JPG](#)



[Die cutting workshop.JPG](#)



[Bookbinding workshop.JPG](#)



[Packing workshop.JPG](#)



[Finished products warehouse.JPG](#)



[Evacuation map.JPG](#)



[Evacuation sign.JPG](#)



[Fire alarm button.JPG](#)



[Fire alarm.JPG](#)



[Fire extinguishers.JPG](#)



[Fire hydrant.JPG](#)



[Safety exit sign and emergency light.JPG](#)



[Canteen interior.JPG](#)



[Dormitory room.JPG](#)



[Eye washing facility.JPG](#)



[First aid kit.JPG](#)



[Potable water.JPG](#)



[Suggestion box.JPG](#)



[Time recording machine.JPG](#)



[Toilet.JPG](#)



[Warning sign.JPG](#)

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