



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <small>(only available on Sedex System)</small>	ZC1046451	Sedex Site Reference: <small>(only available on Sedex System)</small>	ZS1079216	
Business name (Company name):	XXXXXXXXXXXXXX			
Site name:	XXXXXXXXXXXXXX			
Site address:	XXXXXXXX, XXXXXXXXXXXXXX XXXXXXXXXXXXXX XXXXXX CN	Country:	CN	
Site contact and job title:	XXXX Administration Manager XXXXX			
Site phone:	Site e-mail:		XXXXXXX	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-01-10			

Audit Company Name:
TUV Rheinland (TUEV Rheinland)

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. 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.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Alan Wu	APSCA Number:	21703494
Additional Auditors:			
Date of declaration:	2024-01-12		

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation	
Full Name:	XXXXXXXX
Title:	Administration
Date of declaration:	Manager 2024-01-12
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
Nil	

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1	§1 §2 §3 §4 §5 §6	6	0	0	NC - ZAF600302132 NC - ZAF600302133 NC - ZAF600302134 NC - ZAF600302135 NC - ZAF600302136 NC - ZAF600314164
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>	5.1	§7	1	0	0	NC - ZAF600302137
<u>6 - Working hours are not excessive</u>	6.1	§8	1	0	0	NC - ZAF600302138
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

Local Law Issues

Issue	Description
§1	Regulations on Safety in Workplaces Where Chemicals Are Used (1996) Article 12. The chemicals used by the employing units shall have the labels, and the dangerous chemicals should be attached with safety labels. Also, the safety and technical instructions of the chemicals shall be available for operators engaged in the use of the chemical.

§2	Regulation on the Safety Management of Hazardous Chemicals (2013), Article 20. Units producing and storing hazardous chemicals shall set up relevant safety facilities and equipment for inspection, monitoring, ventilation, sun protection, temperature adjustment, fireproofing, fire-fighting, explosion protection, pressure relief, poisoning prevention, neutralization, moisture prevention, lightening prevention, static electricity resistance, antiseptics, leak prevention, and reclamation dams protection or isolated operation in the working site, according to the categories and characteristics of the hazardous chemicals they manufactured, stored, and shall carry out the works of repairing, maintenance regularly to ensure the safety of the running of facilities and equipment according to national standards, industrial standards or relevant provisions of the state.
§3	Law of the PRC on Work Safety, Article 45. Production and business units must provide employees with labour protection products that comply with national standards or industry standards, and supervise and educate employees to wear and use them in accordance with the rules of use.
§4	General Guide for Safety of Electric User (GBT 13869-2008) 6.7. The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring. They shall be checked periodically.
§5	Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010), Article 6.1.1. Give priority to the use of advanced production process, technology and non-toxic (harm) or low toxic (harm) raw materials, eliminate or reduce dust, poisonous harmful factors of occupation; in technology, technology and raw materials are not up to the requirements, should be based on production process and dust, toxic properties, according to the GBZ / T194 design the corresponding provisions dust, gas ventilation control measures, make labor activities in the workplace hazardous substances concentration in line with the GBZ2.1 requirements.
§6	Guideline of Employer of Prevention and Control of Occupational Diseases (GBZ/T 225-2010) Article 4.4.6. Toxic and harmful workplaces that may cause acute occupational injuries should be equipped with flushing equipment. Flushing equipment mainly refers to eye washing device, flowing faucets, and flushing equipment. In workplaces where skin, mucous membranes, or eye burns, corrosive, and irritating chemicals may occur, the above flushing equipment should be equipped. It is particularly emphasized that the flushing equipment should be easy to use and should not hinder work. Ensure that workers can receive flushing within 10 seconds in the event of an accident. The flushing water should be safe and ensure that it is flowing water. The places where flushing equipment is installed should have clear markings, which are easy to find. The above flushing equipment should be ensured to be used normally and corresponding management systems should be established. Responsibilities should be in place, and someone should be responsible. Daily inspections and timely repairs should be carried out.
§7	Labour Law of the People's Republic of China, Article 72. Social insurance funds determine the sources of funds in accordance with the type of insurance, and gradually implement social pooling. Employers and workers must participate in social insurance according to law and pay social insurance premiums. Labour Law of the People's Republic of China, Article 73 Labourers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.
§8	PRC Labour Law, Article 41. The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

Site Details

Site Details		
Company Name	XXXXXXXXXX XXXXXXXX	
Site Name		
GPS location (if available)		XXXXXXXXXX.
	GPS Address:	Latitude: XXXX Longitude: XXXX
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license#: 91350000154307136G. Coordinates:	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of paper products, such as: note book, diary book.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>XXXXXXXXXXlocated at: XXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXX, China. The factory was consisted of 7 buildings: one 1- storey building, one 3-storey building, one 4-storey building and one 5-storey building were used for warehouse and production, one 5- storey building was used for office, one 7-storey building was used for dormitory, one 1-storey building was used for canteen. In addition, there was another one 1-storey building rent by other company named Fujian 1983 Culture Creativity Co., Ltd., which was business in e-commerce without any production activities. The lease contract and independent business license were provided for review. Per onsite observation, this company was located in an independent building and areas were used as warehouse and office only. There was total 498 employees working in the factory, which includes 432 production employees and 66 management. There were 2 shifts for printing workers, shift 1: 8:00-12:00, 13:00-17:00, 18:00-20:00, shift 2: 20:00-00:00, 01:00-5:00, 06:00-08:00. And 1 shift: 8:00-12:00, 14:00- 18:00, with night working from 19:00-21:00 for other workers. All employees were paid at hourly rate. Wages were issued through bank transfer at around 28th of next month. The peak season was not obvious. Due to new platform reasons, the site information display is incomplete and cannot be modified, so it is further explained as below: Company name: XXXXXXXXXXXXXXXXSite name: XXXXXXXXXXXXSite address: XXXXXXXX XX Audit type: Announced 4-Pillar on 10- 12/01/2024; Lead auditor: Alan Wu; Additional auditor(s): Nil.</p>	

Structure and number of buildings	Building Name:		Production building #1
	Floor	Description	Remark
	1F	Raw material warehouse.	Established in 2003.
	2F	Printing workshop.	Nil
	3F	Cutting wokshop.	Nil
	4F	Product development office room.	Nil
	5F	Plastic cover moulding workshop.	Nil
	Building Name:		Production building #2
	Floor	Description	Remark
	1F	Show room.	Established in 2003.
	2F	Printing workshop, semi-finished product warehouse.	Nil
	3F	Accessories warehouse.	Nil
	Building Name:		Production building #3
	Floor	Description	Remark
	1F	Finished product warehouse.	Established in 2003.
	2F	Die cutting workshop, laminating workshop, hot stamping workshop, varnishing workshop.	Nil
	3F	Bookbinding workshop.	Nil
	4F	Packing workshop.	Nil
	Building Name:		Production building #4
	Floor	Description	Remark
	1F	Die cutting workshop, bookbinding workshop, packing workshop.	Established in 2018.
	Building Name:		Office building #1
	Floor	Description	Remark
	1F-5F	Office areas	Established in 2003.

	Building Name:		Dormitory building #1
	Floor	Description	Remark
	1F-7F	Dormitory areas.	Established in 2003.
	Building Name:		Canteen building #1
	Floor	Description	Remark
	1F	Canteen & kitchen.	The building was established in 2003.
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The factory buildings were in good condition. No large crack was observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory provided construction project completion acceptance for all the buildings for review.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season			
Process overview	Plastic cover moulding, cutting, printing, laminating, hot stamping, die cutting, bookbinding (folding, fixing), varnishing, inspection and packing.		
What form of worker representation is there on site?	<input type="checkbox"/> Union <input type="checkbox"/> Worker Committee <input checked="" type="checkbox"/> Other <input type="checkbox"/> None		
Please give details:	Worker representatives in the factory.		
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any on site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Approx. 60% of workers in on site accommodation.		
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		

Audit Parameters						
Time in and time out	Day 1		Day 2		Day 3	
	In	08:30	In	08:30	In	08:00
	Out	17:00	Out	17:00	Out	12:00
Audit type:	PERIODIC					
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	XXXXXXXXX / Administration					
Is further information available	Manager No					

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
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	There was no union in the factory.		
Reason for absence during the audit	There was no union in the factory.		
Reason for absence at the closing meeting	There was no union in the factory.		

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	41	0	0	186	0	0	0	227
Worker numbers – female	55	0	0	150	0	0	0	205
Total	96	0	0	336	0	0	0	432
Number of Workers interviewed – male	3	0	0	11	0	0	0	14
Number of Workers interviewed – female	3	0	0	9	0	0	0	12
Total – interviewed sample size	6	0	0	20	0	0	0	26

Nationalities Structure		
Nationality of Management	Chinese	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Chinese	approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no peak season in the factory.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	100%
	Salaried:	0%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	4 groups of 5 workers.
Number of individual interviews:	Male: 3 Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	All of the interviewees were satisfied with the factory and no compliant information was raised.
What did the workers like the most about working at this site?	All workers said they were satisfied with working conditions of the factory.
Any additional comment(s) regarding interviews:	Nil
Attitude of workers to hours worked:	Favourable
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
Total 26 workers were selected for interview. The workers were assured of confidentiality and they spoke freely of their views of the factory. All interviewed employees stated that their management treated them kindly with respect. They were satisfied with the workplace. They were able to make suggestion to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors. All interviewees seemed confident and calm during the interview process.
Attitude of worker's committee/union reps:
The worker representative was satisfied with the working condition, and all employees could give suggestions on all parts of the site's practices.
Attitude of managers:
The factory management cooperated with the auditor both in on-site observation and documents reviewed. The management was also willing to improve the shortage and the issues found during the audit. All areas were allowed for audit.

Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: XXXXXXXX. Job title: Administration manager.
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Reporting ways such as through workers' representatives directly or write anonymous letter to the suggestion box or call the telephone of the factory boss directly. And the prevention of retaliation procedure was established in the factory.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established the privacy protection procedure and only authorized employees had the right to such kind of information.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 11.0% This year 0.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	9.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(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)	Last year 3.0% This year 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	3.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory maintained complete accidents handling and tracking system.

Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

0B - Management Systems and code Implementation
[Summary of Findings]

0B: Compliance Requirements

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
0.B.3 Suppliers are expected to communicate this Code to all employees.
0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.
0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The factory implemented and maintained the system for delivering compliance to the ETI code. Social responsibility policy and commitment were established. Social responsibility internal audit and management reviews were carried out.
2. The latest social responsibility audit was conducted on Jun. 20, 2023, and the latest management review was conducted on Jul. 11, 2023.
3. Business license was provided to review. The site had all required licences and permission, such as house property certificate.
4. Mr. Luo Jun/ Administration manager was appointed to be responsible for implementing and maintaining systems for delivering compliance to this code.
5. Adequate communications of the code and regular social responsibility trainings were carried out to all employees, including new employees.
6. Adequate communications about the ETI code were provided for the suppliers. Supplier management procedure was established, and the assessment records were provided for review.

Evidence examined:

Employee manual
CSR manual and procedures
Supplier management procedure
Internal CSR audit records and management review records
Training records
Worker interview
Business License
House property certificate

Any other comments:

Nil

Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

No any fine/prosecution happened in the past one year.

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory established procedures such as anti-child labour, anti-prison labour and etc. to prohibit employing child labour and prison labour. Also, the factory established some policies to prohibit discrimination, harassment & abuse.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility posted social compliance standards, such as forced labour, child labour, discrimination, harassment & abuse in the workshop and as per the training records, they were also provided social compliance trainings to employees. According to procedures review, management and employee interview, no negative evidence on forced labour, child labour, discrimination, or harassment & abuse was found.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training records were provided for review, including annual training for in-service employees and pre-work training for newly hired employees.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through worker interview, they revealed that they were trained and learned about the policy. Training records were provided during the audit.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: ISO9001:2015(certification no.: CN-00221022151R4M. Valid from Apr. 16, 2021 to Apr. 21, 2024). ISO14001:2015(certification no.: CN-00222E31347R2M. Valid fro May. 06, 2022 to Apr. 13, 2025).
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Ms. XXXXXXXX, was appointed as Human Resources manager.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Luo Jun/ Administration manager was appointed to be responsible for implementing and maintaining systems for delivering compliance to this code.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Workers' privacy information was protected in the factory.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory established prevention disclosure procedure to ensure the confidential information was kept confidential.

Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessment procedure was established. List of risks was available to review, which included the effectiveness of the policy and procedure of personal privacy information confidentially.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had addressed issues found by risk assessments and set up the preventative action for similar non-compliance.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility communicated the social compliance code to their suppliers and had their supplies signed the code to promise following all standards.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory provided certificate of ownership for review.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. The land in China mainland was belonged to the nation. Anybody, no matter the characters, could only rent the land from governmental department for a period. If the factory would like to use the land, it should apply for it from governmental department. The governmental department would make decision on whether to provide the approval.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility site compensated the owner/lessor for the land prior to the facility being built or expanded.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility demonstrated that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts.

<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No evidence of illegal appropriation of land for facility building or expansion of footprint.</p>
--	---

1 - Freely chosen Employment [Summary of Findings]

1: Compliance Requirements

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. Based on workers' interview and document review, there was no forced, bonded or involuntary prison labour in factory area.
2. The employees obtained their job by themselves or recommendation. Through worker interview and management interview, they stated they were not required to lodge deposits or their ID cards. All new recruited employees kept the identity papers by themselves, only the copy of identity papers should be handed up to HR Dept. for personnel file.
3. All workers were free to move in the workplace, take restroom and water breaks without restrictions.
4. The factory did not restrict workers' freedom and workers could leave the factory freely after shift ends.
- 5 Worker could freely resign after communication with management or fill resign application form in advance of 30 days. 26 out of 26 sampled randomly interviewed workers confirmed they were free to resign after reasonable notice.
6. The factory established procedures to reduce the risk of forced labour, child labour, discrimination, harassment & abuse.

Evidence examined:

Recruitment policy / procedure
Employees manual
Employee labour contract
Employee personnel file with ID copy
Employee interview

Any other comments:

Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Workers could freely resign after communication with management or fill resign application form in advance of 30 days.

<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>N/A</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory did not restrict workers' freedom and workers could leave the factory freely after shift ends.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The risks of forced / trafficked / bonded labour in its supply chain were conveyed to all employees, the site understood the risks.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory established procedures such as anti-forced labour to prohibit employing forced labour or trafficked labour.</p>

2 - Freedom of Association and Right to Collective Bargaining are Respected

[Summary of Findings]

2: Compliance Requirements

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. Policy on respecting freedom association and collective was established. The right of association and right to collective bargaining was not restricted.
2. Based on employee interview, workers were free to raise the suggestion through supervisor, worker representative, HR department and suggestion box directly or anonymously.
3. Procedure of worker representative election was established. The election of worker representative was conducted regularly. There were 6 worker representatives in the factory, which were freely election on Jun. 20, 2023. There was no union in the factory. Workers have the right to join or form trade unions of their own choosing.
4. Worker representatives were responsibility for all employees' suggestion collecting and reporting.
5. Regularly communication meetings between management and worker representative were held. Meeting minutes was provided for review.

Evidence examined:

Freedom of association procedure
Worker representative election procedure
Worker representative election record
Meeting minutes between management and worker representative
Worker representative's interview
Worker interview

Any other comments:

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)

- ☐ Union
 ☐ Worker Committee
☒ Other
 ☐ None

Other details:

Worker representatives in the factory.

Is it a legal requirement to have a union?

- ☐ Yes
 ☒ No

Is it a legal requirement to have a worker's committee?

- ☐ Yes
 ☒ No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)

- ☒ Yes
 ☐ No

Please give details:

6 worker representatives were elected by workers themselves to represent workers to carry out the communication meeting with management regularly.

Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Worker representatives can carry out function without interruption and take advantage of factory facilities.
Name of union and union representative, if applicable:	N/A. No labour union was established in the factory.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker representatives and suggestion boxes.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Based on interview with sampled employees, they knew their worker representatives.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-06-20
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Meetings were held regularly between the worker representative and factory management, relevant records were available for review. According to document review and workers interview, the latest meeting was conducted on Dec. 15, 2023 with topic of PPE using and some benefits.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic [Summary of Findings]

3: Compliance Requirements

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.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. EHS procedures were established, occupational health factors detection report and risk assessment records were available.
2. Mr. Luo Jun / Administration manager took the role of EHS supervisor, and in charge of the safe and hygienic of the working conditions of the factory.
3. Evacuation routes were clean and evacuation plans were posted at all production areas.
4. Adequate exits and adequate fire facilities such as fire extinguishers and fire hydrant were installed in the factory and inspected monthly.
5. Sufficient first aid kits with medicine were equipped at each production floor.
6. Fire alarms and the electrical facility were installed and inspected monthly.
7. Toilets were clean and sufficient in number.
8. Trainings of health and safety were provided to workers regularly.
9. There was one certified electrician in the factory responsible for the maintenance of electric system.
10. There were 7 trained first aiders who trained by Red Cross were available in the factory.
11. There were 4 certified safety officers in the factory.
12. Fire drills were conducted on twice per year in the factory, and the last fire drill was conducted on Dec. 15, 2023.
13. The drinking water stations were easy accessed by workers; the quality test report of drinking water was provided for review.
14. The factory provided the accident record for review. There was no accident happened in the past 12 months in the factory.
15. There was canteen in the factory, the health certificates of kitcheners and the canteen hygiene permit were provided for review.

Evidence examined:


Health and safety policy
Health and safety manual
Training records and certificates
Fire equipment maintenance records
Interviews with employees
Fire drill records
On site observation
First aider certificates and safety officer certificates

Any other comments:


Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had general Health & Safety and occupational Health & Safety policies and procedures that were fit for purpose and these were communicated to workers.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Employees' manual including facility's general Health & Safety and occupational Health & Safety policies and procedures and detailed requirements.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Per factory tour, there was not any structural addition without required permits/inspections.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory informed visitors on H&S and provided for visitors with personal protective equipment. Factory also posted the warning signs to remind visitors and workers.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA, no medical room or medical facility provided and no such legal requirement.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There were 7 trained first aiders with certificates present onsite.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. No transport provided for worker.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through interview with workers, it was confirmed that the personal storage space provided for workers was fit for purpose.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Health & safety risk assessments were conducted with relevant records kept.


<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The valid EIA Report, EIA approval and the final acceptance report for environment protecting were provided for review. The factory also registered its pollution emission on the website of national discharge permit management information platform. In addition, the hazardous waste such as empty chemical containers were collected in the factory and were properly disposed. Waste air, waste water and boundary noise were also tested annually.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site meets its customer requirements on environmental standards, including the use of banned chemicals. No banned chemical was used.</p>

Non-Compliance		Evidence																																
[Back to findings summary]																																		
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600302132</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>230 - No material safety data sheet (MSDS) obtained / available</td></tr><tr><td>Subcategory</td><td>Chemicals</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Regulations on Safety in Workplaces Where Chemicals Are Used (1996) Article 12. The chemicals used by the employing units shall have the labels, and the dangerous chemicals should be attached with safety labels. Also, the safety and technical instructions of the chemicals shall be available for operators engaged in the use of the chemical.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>Insufficient MSDS prepared for chemicals used on site, through on-site observation, it was noted that in printing workshop, MSDS for machine oil and clean agent were prepared, but MSDS for the printing ink was not prepared. 化学品的MSDS准备不充分, 在印刷车间, 机油和清洁剂的MSDS有准备, 但是油墨的MSDS没有准备。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>The factory should prepare MSDS for all chemicals used on-site. 工厂应该为现场使用化学品都准备对应的</td></tr></table>		Non-Compliance		Status	OPEN	Reference	ZAF600302132	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	230 - No material safety data sheet (MSDS) obtained / available	Subcategory	Chemicals	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Regulations on Safety in Workplaces Where Chemicals Are Used (1996) Article 12. The chemicals used by the employing units shall have the labels, and the dangerous chemicals should be attached with safety labels. Also, the safety and technical instructions of the chemicals shall be available for operators engaged in the use of the chemical.	ETI code	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.	Explanation to the non compliance	Insufficient MSDS prepared for chemicals used on site, through on-site observation, it was noted that in printing workshop, MSDS for machine oil and clean agent were prepared, but MSDS for the printing ink was not prepared. 化学品的MSDS准备不充分, 在印刷车间, 机油和清洁剂的MSDS有准备, 但是油墨的MSDS没有准备。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	The factory should prepare MSDS for all chemicals used on-site. 工厂应该为现场使用化学品都准备对应的	<div><p>No MSDS prepared for the inks in printing workshop.JPG</p></div>
Non-Compliance																																		
Status	OPEN																																	
Reference	ZAF600302132																																	
Clause	3 - Working Conditions are Safe and Hygienic																																	
Issue Title	230 - No material safety data sheet (MSDS) obtained / available																																	
Subcategory	Chemicals																																	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																																	
Raised by audit	ZAA600001809																																	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																																	
Root cause - Other																																		
Local law issue	Regulations on Safety in Workplaces Where Chemicals Are Used (1996) Article 12. The chemicals used by the employing units shall have the labels, and the dangerous chemicals should be attached with safety labels. Also, the safety and technical instructions of the chemicals shall be available for operators engaged in the use of the chemical.																																	
ETI code	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.																																	
Explanation to the non compliance	Insufficient MSDS prepared for chemicals used on site, through on-site observation, it was noted that in printing workshop, MSDS for machine oil and clean agent were prepared, but MSDS for the printing ink was not prepared. 化学品的MSDS准备不充分, 在印刷车间, 机油和清洁剂的MSDS有准备, 但是油墨的MSDS没有准备。																																	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other																																	
Actions	The factory should prepare MSDS for all chemicals used on-site. 工厂应该为现场使用化学品都准备对应的																																	


	MSDS.	
--	-------	--

Non-Compliance		Evidence																													
[Back to findings summary]																															
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600302133</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)</td></tr><tr><td>Subcategory</td><td>Chemicals</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Regulation on the Safety Management of Hazardous Chemicals (2013), Article 20. Units producing and storing hazardous chemicals shall set up relevant safety facilities and equipment for inspection, monitoring, ventilation, sun protection, temperature adjustment, fireproofing, fire-fighting, explosion protection, pressure relief, poisoning prevention, neutralization, moisture prevention, lightening prevention, static electricity resistance, antiseptic, leak prevention, and reclamation dams protection or isolated operation in the working site, according to the categories and characteristics of the hazardous chemicals they manufactured, stored, and shall carry out the works of repairing, maintenance regularly to ensure the safety of the running of facilities and equipment according to national standards, industrial standards or relevant provisions of the state.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>No secondary container provided for around 6% chemicals used in workshop. 约6%的车间使用的化学产品没有配备二次容器。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600302133	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	Subcategory	Chemicals	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Regulation on the Safety Management of Hazardous Chemicals (2013), Article 20. Units producing and storing hazardous chemicals shall set up relevant safety facilities and equipment for inspection, monitoring, ventilation, sun protection, temperature adjustment, fireproofing, fire-fighting, explosion protection, pressure relief, poisoning prevention, neutralization, moisture prevention, lightening prevention, static electricity resistance, antiseptic, leak prevention, and reclamation dams protection or isolated operation in the working site, according to the categories and characteristics of the hazardous chemicals they manufactured, stored, and shall carry out the works of repairing, maintenance regularly to ensure the safety of the running of facilities and equipment according to national standards, industrial standards or relevant provisions of the state.	ETI code	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.	Explanation to the non compliance	No secondary container provided for around 6% chemicals used in workshop. 约6%的车间使用的化学产品没有配备二次容器。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	<div><p><u>No secondary container for chemical used in workshop.JPG</u></p></div>
Non-Compliance																															
Status	OPEN																														
Reference	ZAF600302133																														
Clause	3 - Working Conditions are Safe and Hygienic																														
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)																														
Subcategory	Chemicals																														
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																														
Raised by audit	ZAA600001809																														
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																														
Root cause - Other																															
Local law issue	Regulation on the Safety Management of Hazardous Chemicals (2013), Article 20. Units producing and storing hazardous chemicals shall set up relevant safety facilities and equipment for inspection, monitoring, ventilation, sun protection, temperature adjustment, fireproofing, fire-fighting, explosion protection, pressure relief, poisoning prevention, neutralization, moisture prevention, lightening prevention, static electricity resistance, antiseptic, leak prevention, and reclamation dams protection or isolated operation in the working site, according to the categories and characteristics of the hazardous chemicals they manufactured, stored, and shall carry out the works of repairing, maintenance regularly to ensure the safety of the running of facilities and equipment according to national standards, industrial standards or relevant provisions of the state.																														
ETI code	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.																														
Explanation to the non compliance	No secondary container provided for around 6% chemicals used in workshop. 约6%的车间使用的化学产品没有配备二次容器。																														
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																														


Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The factory should provide secondary container for all the chemical used in workshop. 工厂应该为所有车间使用的化学品准备二次容器。	

Non-Compliance		Evidence																																	
[Back to findings summary]																																			
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600302134</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate</td></tr><tr><td>Subcategory</td><td>Personal Protective Equipment/Clothing</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Law of the PRC on Work Safety, Article 45. Production and business units must provide employees with labour protection products that comply with national standards or industry standards, and supervise and educate employees to wear and use them in accordance with the rules of use.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>The management had prepared rubber gloves were prepared for book cover gluing workers, but book cover gluing workers did not wear rubber gloves during operation. 管理层有准备橡胶手套给封面粘胶工人，但是封面粘胶工人操作时没有戴橡胶手套。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>It is recommended that employees should be trained and enforced to use Personal Protection Equipment properly. 建议培训和加强员工正确地使用</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600302134	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Subcategory	Personal Protective Equipment/Clothing	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Law of the PRC on Work Safety, Article 45. Production and business units must provide employees with labour protection products that comply with national standards or industry standards, and supervise and educate employees to wear and use them in accordance with the rules of use.	ETI code	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.	Explanation to the non compliance	The management had prepared rubber gloves were prepared for book cover gluing workers, but book cover gluing workers did not wear rubber gloves during operation. 管理层有准备橡胶手套给封面粘胶工人，但是封面粘胶工人操作时没有戴橡胶手套。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It is recommended that employees should be trained and enforced to use Personal Protection Equipment properly. 建议培训和加强员工正确地使用	<div><p>Cover gluing worker did not wear rubber gloves.JPG</p></div>
Non-Compliance																																			
Status	OPEN																																		
Reference	ZAF600302134																																		
Clause	3 - Working Conditions are Safe and Hygienic																																		
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate																																		
Subcategory	Personal Protective Equipment/Clothing																																		
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																																		
Raised by audit	ZAA600001809																																		
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																																		
Root cause - Other																																			
Local law issue	Law of the PRC on Work Safety, Article 45. Production and business units must provide employees with labour protection products that comply with national standards or industry standards, and supervise and educate employees to wear and use them in accordance with the rules of use.																																		
ETI code	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.																																		
Explanation to the non compliance	The management had prepared rubber gloves were prepared for book cover gluing workers, but book cover gluing workers did not wear rubber gloves during operation. 管理层有准备橡胶手套给封面粘胶工人，但是封面粘胶工人操作时没有戴橡胶手套。																																		
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																		
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other																																		
Actions	It is recommended that employees should be trained and enforced to use Personal Protection Equipment properly. 建议培训和加强员工正确地使用																																		


	个人防护用品。	
--	---------	--

Non-Compliance		Evidence																																					
[Back to findings summary]																																							
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600302135</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels</td></tr><tr><td>Subcategory</td><td>Electrical risk</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Resolved by audit</td><td>ZAA600042585</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>General Guide for Safety of Electric User (GBT 13869-2008) 6.7. The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring. They shall be checked periodically.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>During on site tour, it was found that one electric box at plastic cover moulding workshop was not kept locking for safety. 现场走访发现，塑料封面成型车间的一个电箱没有安全上锁。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>It is recommended that all electric boxes in workshop should be kept locking for safety. 建议车间的所有电箱都要保持安全上锁。</td></tr><tr><td>Additional</td><td>It is recommended that all electric boxes in</td></tr></table>			Non-Compliance		Status	CLOSED	Reference	ZAF600302135	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels	Subcategory	Electrical risk	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Resolved by audit	ZAA600042585	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	General Guide for Safety of Electric User (GBT 13869-2008) 6.7. The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring. They shall be checked periodically.	ETI code	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.	Explanation to the non compliance	During on site tour, it was found that one electric box at plastic cover moulding workshop was not kept locking for safety. 现场走访发现，塑料封面成型车间的一个电箱没有安全上锁。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It is recommended that all electric boxes in workshop should be kept locking for safety. 建议车间的所有电箱都要保持安全上锁。	Additional	It is recommended that all electric boxes in	<div><p><u>Electric box was not kept locking for safety.JPG</u></p></div>
Non-Compliance																																							
Status	CLOSED																																						
Reference	ZAF600302135																																						
Clause	3 - Working Conditions are Safe and Hygienic																																						
Issue Title	228 - Unsafe handling of electrical equipment e.g. no rubber mats in front of electricity panels																																						
Subcategory	Electrical risk																																						
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																																						
Raised by audit	ZAA600001809																																						
Resolved by audit	ZAA600042585																																						
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																																						
Root cause - Other																																							
Local law issue	General Guide for Safety of Electric User (GBT 13869-2008) 6.7. The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring. They shall be checked periodically.																																						
ETI code	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.																																						
Explanation to the non compliance	During on site tour, it was found that one electric box at plastic cover moulding workshop was not kept locking for safety. 现场走访发现，塑料封面成型车间的一个电箱没有安全上锁。																																						
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																						
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other																																						
Actions	It is recommended that all electric boxes in workshop should be kept locking for safety. 建议车间的所有电箱都要保持安全上锁。																																						
Additional	It is recommended that all electric boxes in																																						

comments	workshop should be kept locking for safety. 建议车间的所有电箱都要保持安全上锁。 Periodic audit conducted on Jan. 10-12, 2024: Closed. Through on-site observation, it was noted that all electric boxes at plastic cover molding workshop were kept locking for safety.	
----------	--	--

Non-Compliance		Evidence																															
[Back to findings summary]																																	
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600302136</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>256 - No / inadequate ventilation systems</td></tr><tr><td>Subcategory</td><td>Building/Site Maintenance</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Resolved by audit</td><td>ZAA600042585</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010), Article 6.1.1. Give priority to the use of advanced production process, technology and non-toxic (harm) or low toxic (harm) raw materials, eliminate or reduce dust, poisonous harmful factors of occupation; in technology, technology and raw materials are not up to the requirements, should be based on production process and dust, toxic properties, according to the GBZ / T194 design the corresponding provisions dust, gas ventilation control measures, make labor activities in the workplace hazardous substances concentration in line with the GBZ2.1 requirements.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>Ventilation was insufficient in workshops, through on-site observation, it was noted that two air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building was not kept on running in working time. 车间通风不良，现场走访发现位于4层生产楼3楼的装订车间的2个排气扇没有在上班时保持开启。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr></table>			Non-Compliance		Status	CLOSED	Reference	ZAF600302136	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	256 - No / inadequate ventilation systems	Subcategory	Building/Site Maintenance	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Resolved by audit	ZAA600042585	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010), Article 6.1.1. Give priority to the use of advanced production process, technology and non-toxic (harm) or low toxic (harm) raw materials, eliminate or reduce dust, poisonous harmful factors of occupation; in technology, technology and raw materials are not up to the requirements, should be based on production process and dust, toxic properties, according to the GBZ / T194 design the corresponding provisions dust, gas ventilation control measures, make labor activities in the workplace hazardous substances concentration in line with the GBZ2.1 requirements.	ETI code	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.	Explanation to the non compliance	Ventilation was insufficient in workshops, through on-site observation, it was noted that two air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building was not kept on running in working time. 车间通风不良，现场走访发现位于4层生产楼3楼的装订车间的2个排气扇没有在上班时保持开启。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	<div><p><u>Air ventilation fan in bookbinding workshop was not kept on running.JPG</u></p></div>
Non-Compliance																																	
Status	CLOSED																																
Reference	ZAF600302136																																
Clause	3 - Working Conditions are Safe and Hygienic																																
Issue Title	256 - No / inadequate ventilation systems																																
Subcategory	Building/Site Maintenance																																
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																																
Raised by audit	ZAA600001809																																
Resolved by audit	ZAA600042585																																
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																																
Root cause - Other																																	
Local law issue	Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010), Article 6.1.1. Give priority to the use of advanced production process, technology and non-toxic (harm) or low toxic (harm) raw materials, eliminate or reduce dust, poisonous harmful factors of occupation; in technology, technology and raw materials are not up to the requirements, should be based on production process and dust, toxic properties, according to the GBZ / T194 design the corresponding provisions dust, gas ventilation control measures, make labor activities in the workplace hazardous substances concentration in line with the GBZ2.1 requirements.																																
ETI code	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.																																
Explanation to the non compliance	Ventilation was insufficient in workshops, through on-site observation, it was noted that two air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building was not kept on running in working time. 车间通风不良，现场走访发现位于4层生产楼3楼的装订车间的2个排气扇没有在上班时保持开启。																																
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																

Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building should be kept on running in working time. 建议位于4层生产楼3楼的装订车间的排气扇在上班时间保持开启。	
Additional comments	It is recommended that the air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building should be kept on running in working time. 建议位于4层生产楼3楼的装订车间的排气扇在上班时间保持开启。 Periodic audit conducted on Jan. 10-12, 2024: Closed. Through on-site observation and workers interview, it was noted that all air exhaust fans in bookbinding workshop at the 3rd floor of the 4-storey building were kept on running in working time.	

Non-Compliance		Evidence																									
[Back to findings summary]																											
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600314164</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>242 - No / inadequate eye wash / shower station in hazardous environments including chemical areas</td></tr><tr><td>Subcategory</td><td>Chemicals</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Guideline of Employer of Prevention and Control of Occupational Diseases (GBZ/T 225-2010) Article 4.4.6. Toxic and harmful workplaces that may cause acute occupational injuries should be equipped with flushing equipment. Flushing equipment mainly refers to eye washing device, flowing faucets, and flushing equipment. In workplaces where skin, mucous membranes, or eye burns, corrosive, and irritating chemicals may occur, the above flushing equipment should be equipped. It is particularly emphasized that the flushing equipment should be easy to use and should not hinder work. Ensure that workers can receive flushing within 10 seconds in the event of an accident. The flushing water should be safe and ensure that it is flowing water. The places where flushing equipment is installed should have clear markings, which are easy to find. The above flushing equipment should be ensured to be used normally and corresponding management systems should be established. Responsibilities should be in place, and someone should be responsible. Daily inspections and timely repairs should be carried out.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>Through on-site observation, it was found that the eye washing device at the 3rd floor bookbinding workshop of the 4-storey building was blocked by</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600314164	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	242 - No / inadequate eye wash / shower station in hazardous environments including chemical areas	Subcategory	Chemicals	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Guideline of Employer of Prevention and Control of Occupational Diseases (GBZ/T 225-2010) Article 4.4.6. Toxic and harmful workplaces that may cause acute occupational injuries should be equipped with flushing equipment. Flushing equipment mainly refers to eye washing device, flowing faucets, and flushing equipment. In workplaces where skin, mucous membranes, or eye burns, corrosive, and irritating chemicals may occur, the above flushing equipment should be equipped. It is particularly emphasized that the flushing equipment should be easy to use and should not hinder work. Ensure that workers can receive flushing within 10 seconds in the event of an accident. The flushing water should be safe and ensure that it is flowing water. The places where flushing equipment is installed should have clear markings, which are easy to find. The above flushing equipment should be ensured to be used normally and corresponding management systems should be established. Responsibilities should be in place, and someone should be responsible. Daily inspections and timely repairs should be carried out.	ETI code	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.	Explanation to the non compliance	Through on-site observation, it was found that the eye washing device at the 3rd floor bookbinding workshop of the 4-storey building was blocked by	<div></div> <div>Eye washing devise was blocked by machine.JPG</div>
Non-Compliance																											
Status	OPEN																										
Reference	ZAF600314164																										
Clause	3 - Working Conditions are Safe and Hygienic																										
Issue Title	242 - No / inadequate eye wash / shower station in hazardous environments including chemical areas																										
Subcategory	Chemicals																										
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																										
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																										
Root cause - Other																											
Local law issue	Guideline of Employer of Prevention and Control of Occupational Diseases (GBZ/T 225-2010) Article 4.4.6. Toxic and harmful workplaces that may cause acute occupational injuries should be equipped with flushing equipment. Flushing equipment mainly refers to eye washing device, flowing faucets, and flushing equipment. In workplaces where skin, mucous membranes, or eye burns, corrosive, and irritating chemicals may occur, the above flushing equipment should be equipped. It is particularly emphasized that the flushing equipment should be easy to use and should not hinder work. Ensure that workers can receive flushing within 10 seconds in the event of an accident. The flushing water should be safe and ensure that it is flowing water. The places where flushing equipment is installed should have clear markings, which are easy to find. The above flushing equipment should be ensured to be used normally and corresponding management systems should be established. Responsibilities should be in place, and someone should be responsible. Daily inspections and timely repairs should be carried out.																										
ETI code	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.																										
Explanation to the non compliance	Through on-site observation, it was found that the eye washing device at the 3rd floor bookbinding workshop of the 4-storey building was blocked by																										

	machine. 现场走访发现位于4层生产楼3楼的装订车间的洗眼器被设备堵塞。
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other
Actions	It is recommended that the eye washing device in bookbinding workshop at the 3rd floor of the 4-storey building should be kept in the status of easy using. 建议位于4层生产楼3楼的装订车间的洗眼器保持易于使用的状态。

4 - Child Labour Shall Not Be Used [Summary of Findings]

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. Anti-child labour/ Child labour remediation management procedure was established.

2. The management indicated that they would never employ and use any child labour. Applicants should provide their original ID card for age verification during the recruitment and they would be refused if they were found younger than 16 years old or they used fake ID certificate.

3. The factory has one manager to interview and check ID cards to verify ages during the recruitment of workers.

4. Sufficient numbers of employees' personal files were provided for review. Each employee file included a bio-data sheet, a recent photo and the age documentation, which was in the form of photocopied national identification card.

5. Based on employee interview and factory tour, no child labour or young worker in the factory the youngest worker was 19 years old.

Evidence examined:

Anti-child labour policy

Recruitment system

Employees roster

Employee personnel files with employee ID copies

Labour contracts

Employee interview

Any other comments:

Nil

Legal age of employment:	16
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, there was no worker under 18 years old.

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The local minimum wage standard for full-time work was set at RMB1960 per Month equivalent to RMB 11.26 per hour (1960/21.75/8).

2. Wages were paid at around 28th of the following month by bank transfer, the current paid month was Nov, 2023. Payrolls from Dec. 2022 to Nov. 2023 were reviewed during the audit. As shown in the payroll and verified through worker interviews, wage was calculated at hourly rate. Based on provided payroll records, the minimum wage paid was RMB 1960 per month (RMB 11.26 per hour) which met legal requirement.

3. All employees were provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they were paid.

4. In Employee Handbook, annual leave, statutory holiday, sick leave, marriage leave, maternity leave and funeral leave were defined. And through payroll and leave records review, these paid leaves were provided to workers.

5. Based the records provided by the factory, all employees were paid correctly for their overtime wages, as per payrolls records, 150%, 200% and 300% of normal wage rate was paid for overtime work on normal days, rest days and holidays respectively.

6. Benefits such as paid, annual leave, child-bearing leave were given to appropriate workers.

7. Through document review and employee interview, the numbers of workers on attendance and payroll records are consistent with the number of workers in the employee register. The calculated period was from 1st to the end of every month.

8. Not all workers were provided with social insurance. There was total 498 employees employed at the factory during audit date, 15 employees were retirees hired to work again who were provided with commercial insurance, 10 employees were new hired after Nov. 2023, 46 employees resigned after Nov. 2023, therefor the factory should provide social insurance to 519 employees in Nov. 2023. The factory provided social insurance receipts from Dec. 2022 to Nov. 2023 for review. As per the social insurance receipts in Nov. 2023 and management interview, among the 519 employees, 356 employees (68.6%) were provided with retirement insurance, 355 employees (68.4%) were provided with unemployment insurance, 337 employees (64.9%) were provided with medical insurance and child-bearing insurance, all the 519 employees (100%) were provided with work related injury insurance.

Evidence examined:

Payroll record
Attendance record
Minimum wage document
Management interview
Worker interview
Social insurance receipt
Commercial insurance Receipt

Any other comments:

Nil

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: 174.0	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 184.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 18.0 Per Month: 92.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 90.11 Per Week: 450.57 Per Month: 1960.0	Actual Per Day: 90.11 Per Week: 450.57 Per Month: 1960.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 33.78 Per Week: 135.2 Per Month: 1159.78	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Wage list and attendance for 26 samples from Apr. 2023 (random month) 26 samples from Jul. 2023 (random month) 26 samples from Nov. 2023 (current paid month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	RMB 11.26 per hour / RMB 90.11 per week / RMB 1960 per month.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 30.0% of workforce earning minimum wage 70.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Post allowance and meal allowance. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	1. Individual part of social insurance. 2. Individual income tax.		

Have these deductions been made?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Please list all deductions that have been made.	Nil
Please list all deductions that have not been made.	1. Individual part of social insurance. 2. Individual income tax. Deduction of Individual part of social insurance and individual income tax were fully paid by the auditee.
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The attendance records indicated that the punched in and out were calculated as work time and meetings before or after work were paid for their time, based on workers interview and management interview.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory conducted the basic need survey to check whether the paid wage could meet the basic needs.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Confirmed by workers interview, management interview and factory policy review, equal rates were being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

Non-Compliance		Evidence																										
[Back to findings summary]																												
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600302137</td></tr><tr><td>Clause</td><td>5 - Living Wages are Paid</td></tr><tr><td>Issue Title</td><td>423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic</td></tr><tr><td>Subcategory</td><td>Benefits & Insurance</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>Labour Law of the People's Republic of China, Article 72. Social insurance funds determine the sources of funds in accordance with the type of insurance, and gradually implement social pooling. Employers and workers must participate in social insurance according to law and pay social insurance premiums. Labour Law of the People's Republic of China, Article 73 Labourers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.</td></tr><tr><td>ETI code</td><td>5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</td></tr><tr><td>Explanation to the non compliance</td><td>Not all workers were provided with social insurance. There was total 490 employees employed at the factory during audit date, 27 employees were retirees hired to work again who were provided with commercial insurance, after Nov. 2022, 10 employees were new hired and 4 employees resigned, therefor the factory should provide social insurance to 457 employees in Nov. 2022. The factory provided social insurance receipts from Dec. 2021 to Nov. 2022 for review. As per the social insurance receipts in Nov. 2022 and management interview, only 291 out of the 457 employees (63.7%) were provided with medical insurance, and child-bearing insurance, and only 318 out of the 457 employees (69.6%) were provided unemployment</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600302137	Clause	5 - Living Wages are Paid	Issue Title	423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	Subcategory	Benefits & Insurance	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	Labour Law of the People's Republic of China, Article 72. Social insurance funds determine the sources of funds in accordance with the type of insurance, and gradually implement social pooling. Employers and workers must participate in social insurance according to law and pay social insurance premiums. Labour Law of the People's Republic of China, Article 73 Labourers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.	ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	Explanation to the non compliance	Not all workers were provided with social insurance. There was total 490 employees employed at the factory during audit date, 27 employees were retirees hired to work again who were provided with commercial insurance, after Nov. 2022, 10 employees were new hired and 4 employees resigned, therefor the factory should provide social insurance to 457 employees in Nov. 2022. The factory provided social insurance receipts from Dec. 2021 to Nov. 2022 for review. As per the social insurance receipts in Nov. 2022 and management interview, only 291 out of the 457 employees (63.7%) were provided with medical insurance, and child-bearing insurance, and only 318 out of the 457 employees (69.6%) were provided unemployment
Non-Compliance																												
Status	OPEN																											
Reference	ZAF600302137																											
Clause	5 - Living Wages are Paid																											
Issue Title	423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic																											
Subcategory	Benefits & Insurance																											
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																											
Raised by audit	ZAA600001809																											
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																											
Root cause - Other																												
Local law issue	Labour Law of the People's Republic of China, Article 72. Social insurance funds determine the sources of funds in accordance with the type of insurance, and gradually implement social pooling. Employers and workers must participate in social insurance according to law and pay social insurance premiums. Labour Law of the People's Republic of China, Article 73 Labourers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.																											
ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.																											
Explanation to the non compliance	Not all workers were provided with social insurance. There was total 490 employees employed at the factory during audit date, 27 employees were retirees hired to work again who were provided with commercial insurance, after Nov. 2022, 10 employees were new hired and 4 employees resigned, therefor the factory should provide social insurance to 457 employees in Nov. 2022. The factory provided social insurance receipts from Dec. 2021 to Nov. 2022 for review. As per the social insurance receipts in Nov. 2022 and management interview, only 291 out of the 457 employees (63.7%) were provided with medical insurance, and child-bearing insurance, and only 318 out of the 457 employees (69.6%) were provided unemployment																											

	insurance, retirement insurance, and work-related injury insurance. 社保缴纳不足，工厂共雇佣了490名员工，其中有27名员工是退休人员有提供商业保险，2022年11月后，有10名新入职员工，有4名员工辞职，因此工厂2022年11月应为457名员工提供社会保险。工厂提供了2021年 12月至2022年11月的社会保险收据供审查，根据2022年11月的社会保障收据和管理层访谈，工厂只给457名工人中的291名员工（63.7%）提供了医疗保险和生育保险、只给457名工人中的318名员工（69.6%）提供了养老保险、失业保险, 和工伤保险。			
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit			
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other			
Actions	The factory should provide social insurance for all workers according to the law. 工厂要为所有工人提供社保5险。			

6 - Working Hours are not Excessive [Summary of Findings]

6: Compliance Requirements

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.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The attendance records for workers from Dec. 01, 2022 to audit date for review during the audit.
2. The working hours in the factory were recorded by fingerprint recognition attendance system. There were 2 shifts for printing workers, shift 1: 8:00-12:00, 13:00-17:00, 18:00-20:00, shift 2: 20:00-00:00, 01:00-5:00, 06:00-08:00. And 1 shift: 8:00-12:00, 14:00- 18:00, with night working from 19:00-21:00 for other workers.
3. Based on worker interview and document review, Saturday working was calculated as overtime and Sunday was guaranteed to be rest day.
4. The maximum weekly total working hours including overtime hours were 60 hours, which did not exceed 60 hours by the ETI code.
5. During the workers' interview, workers confirmed that they worked overtime voluntarily. The workers had right to refuse overtime work.
6. Based on attendance records from Dec. 01, 2022 to audit day review, it was found that workers' monthly overtime hours exceeded 36 hours in each month. Three sampled months Nov. 2023 (current paid month), Jul. 2023 and Apr. 2023 were randomly selected. It was found that 26 out of 26 workers' monthly overtime exceeded 36 hours with the highest 84 hours in Nov. 2023, 26 out of 26 workers' monthly overtime exceeded 36 hours with the highest 92 hours in Jul. 2023 and 26 out of 26 workers' monthly overtime exceeded 36 hours with the highest 88 hours in Apr. 2023.

Evidence examined:

Attendance Records: from Dec. 01, 2022 to the audit day.
Production records: daily production records, delivery in/ out records of warehouse, inspection records.
Employee interview

Any other comments:

Nil

Working hours' analysis

Systems & Processes

What timekeeping systems are used?	Fingerprint recognition attendance system.
------------------------------------	--

Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days	<input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Maximum number of days worked without a day off (in sample):	6		
Standard/Contracted Hours worked			
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:		
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Overtime Hours worked			
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day / 18 hours per week/ 88 hours per month in Apr. 2023. 2 hours per day / 18 hours per week/ 92 hours per month in Jul. 2023. 2 hours per day / 18 hours per week/ 84 hours per month in Nov. 2023.		
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The max combined hours were 60 hours.		
Approximate percentage of total workers on highest overtime hours:	80.0%		

Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: Labour contracts had defined that the workers' overtime working were voluntary. Working hours' procedure also stipulated that the workers can attend the overtime working by their voluntary. In additional, 26 out of 26 randomly sample interviewed workers also confirmed that they took the overtime working by their own will.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: 150%, 200% and 300% of regular rate for regular overtime, rest day overtime and statutory holiday overtime respectively were paid to the employees.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% workers were paid at a premium monthly.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	N/A, the OT premium over 125%.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<div> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety </div> <div> <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify) </div>
Please give details	N/A, the Max. total hours per week was 60 hours.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Non-Compliance		Evidence																										
[Back to findings summary]																												
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600302138</td></tr><tr><td>Clause</td><td>6 - Working Hours are not Excessive</td></tr><tr><td>Issue Title</td><td>480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive</td></tr><tr><td>Subcategory</td><td>Overtime</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600001809</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>PRC Labour Law, Article 41. The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td>Based on attendance records from Dec. 01, 2021 to audit day review, it was found that workers' monthly overtime hours exceeded 36 hours in each month. Three sampled months Nov. 2022 (current paid month), Jul. 2022 and Dec. 2021 were randomly selected. It was found that 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 84 hours in Nov. 2022, 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 92 hours in Jul. 2022 and 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 86 hours in Dec. 2021. 月加班工时超过36小时，根据2021年12月1日至审核当日的考勤记录，发现工人月加班时间超过36小时。在随机选择2022年11月（当前月）、2022年7月和2021年12月（随机月）中发现，2022年11月，26名工人中的23名工人的月加班时间超过36小时，最高为84小时，2022年7月26名工</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600302138	Clause	6 - Working Hours are not Excessive	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	Subcategory	Overtime	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600001809	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	PRC Labour Law, Article 41. The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.	ETI code	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.	Explanation to the non compliance	Based on attendance records from Dec. 01, 2021 to audit day review, it was found that workers' monthly overtime hours exceeded 36 hours in each month. Three sampled months Nov. 2022 (current paid month), Jul. 2022 and Dec. 2021 were randomly selected. It was found that 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 84 hours in Nov. 2022, 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 92 hours in Jul. 2022 and 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 86 hours in Dec. 2021. 月加班工时超过36小时，根据2021年12月1日至审核当日的考勤记录，发现工人月加班时间超过36小时。在随机选择2022年11月（当前月）、2022年7月和2021年12月（随机月）中发现，2022年11月，26名工人中的23名工人的月加班时间超过36小时，最高为84小时，2022年7月26名工
Non-Compliance																												
Status	OPEN																											
Reference	ZAF600302138																											
Clause	6 - Working Hours are not Excessive																											
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																											
Subcategory	Overtime																											
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over																											
Raised by audit	ZAA600001809																											
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other																											
Root cause - Other																												
Local law issue	PRC Labour Law, Article 41. The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.																											
ETI code	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.																											
Explanation to the non compliance	Based on attendance records from Dec. 01, 2021 to audit day review, it was found that workers' monthly overtime hours exceeded 36 hours in each month. Three sampled months Nov. 2022 (current paid month), Jul. 2022 and Dec. 2021 were randomly selected. It was found that 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 84 hours in Nov. 2022, 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 92 hours in Jul. 2022 and 23 out of 26 workers' monthly overtime exceeded 36 hours with the highest 86 hours in Dec. 2021. 月加班工时超过36小时，根据2021年12月1日至审核当日的考勤记录，发现工人月加班时间超过36小时。在随机选择2022年11月（当前月）、2022年7月和2021年12月（随机月）中发现，2022年11月，26名工人中的23名工人的月加班时间超过36小时，最高为84小时，2022年7月26名工																											

	人中的23名工人的月加班时间超过36小时，最高为92小时，2021年12月26人工人中的23名工人的月加班时间超过36小时，最高为86小时。	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should reduce the overtime to ensure the monthly overtime hours within 36 hours per month. 工厂应将月加班时间控制在 36 小时以内。	

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. Anti-discrimination policy was reviewed. And no discrimination issue was found.
2. No employee was required to do the examination of the hepatitis B virus or HIV, confirmed by worker interview.
3. Employment contracts were provided for review and they showed that male and female employees are on the same pay grade.
4. There was an internal grievance process, all interviewed workers were aware of the grievance channels in case they encountered any discrimination cases.
5. There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found.
6. No any documents show any differential treatment to different workers, constituting discrimination.

Evidence examined:

Factory rules and regulations
Wages, benefits and compensation policy.
Employment contracts
Disciplinary practices
Penalty records / reward records
Promotion / demotion records
Appeal, suggestion records and follow-up

Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 72.7%	Female: 27.3%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	Machine engineer: 19.	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	N/A	
Professional Development		
What type of training and development are available for workers?	Production management, production knowledge, machine operation, etc.	

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. Work performed was on the basis of recognized employment relationship established through national law and practice.
2. The factory signed labour contracts with employees within 30 days after employment.
3. All employees were hired directly without employment agencies.
4. Per document review and worker interview, no any recruitment fee was paid by workers at any recruitment process.
5. Interview workers confirmed all terms of employment contract and signed by them, and they retained one copy of employment contract themselves.

Evidence examined:

Employee Handbook
Labour contracts
Worker interview
Recruitment policy
Personal file with ID copy

Any other comments:

Nil

Responsible Recruitment

All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	All production processes and management.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, the migrant worker was employed by the factory directly and no such deduction.
Is there any observation on this finding?	N/A
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 12 migrant employees in the management roles and 8 migrant employees in technical roles.
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A, no agency used.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no agency used.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no agency used.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no contractor used.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no contractor used.

8A - Sub-Contracting and Homeworking [Summary of Findings]

8A: Compliance Requirements

8.A.1 There should be no sub-contracting unless previously agreed with the main client.

8.A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

It was confirmed through document review, factory tour, management interview and employee interview, that no subcontracting or homeworking was used by the factory. All processes were finished within the factory.

Evidence examined:

List of approval supplier
Production records
On-site observation
Management interview and worker interview

Any other comments:

Nil

Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The factory had established the written policy on anti-harassment and anti-abuse.
2. The factory had established disciplinary procedure for workers' misbehaviour, which included oral warning, written warning and finally termination.
3. The factory had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
4. Employees could express the grievance through worker representatives, hot line and suggestion boxes. Any received complaint would be handled by management, without any reprisal for the worker in question.
5. No abuse, harassment or disciplinary deduction was reported during the interview.

Evidence examined:

Employee Handbook
Worker interview
Management interview
Factory tour

Any other comments:

Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The contact information of 3rd party such as Chinese association of labour, local labour union and community was posted in the factory.
If yes, are workers aware of these channels and have access? Please give details.	Per management interview and workers interview, the workers confirmed that they knew the way to report their complaints or grievances to 3rd party. Management revealed that they did not interfere with such reporting channels.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Hotline and suggestion box etc.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Confirmed by workers' interview, and procedure provided by the factory. Workers can access to workers' representatives directly or write anonymous letter to the suggestion box or call the telephone of the factory boss directly.

Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

10A - Entitlement to Work and Immigration
[Summary of Findings]

10A: Compliance Requirements

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. As per document review, management and workers interview, no employment agency was used by the factory.
2. The factory recruited the new workers directly by the advertisements, employees' recommendation and recruitment fair.
3. All workers in the factory were Chinese. The migrant workers only came from other provinces of China.
4. All workers had the proper legal rights to work in this region.
5. No agency staff or foreign worker was found during this audit.

Evidence examined:

Employee Handbook
Employee Roster
Personnel file with ID copy

Any other comments:

Nil

10B4 - Environment 4–Pillar [Summary of Findings]

10B4: Compliance Requirements

10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).

10.B4.7 Businesses shall make continuous improvements in their environmental performance.

10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10.B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

10B4: Guidance for Observations

10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The factory had established written procedure for environment management and appointed, Mr. Luo Jun / Administration manager, as responsible person.
2. The factory had established documented environment management system and obtained ISO14001:2015 management certificate, and environment risk assessment had been conducted for better management.
3. The factory had required its suppliers to commit to be compliant with local law regarding environment issues.
4. Based on observation on site, sanitary sewage was discharged to sewerage system as per regulation requirement, production wastes were classified and collected.
5. The boundary waste discharge tests were conducted annually to prove the waste discharge of the factory activities met the local environment management regulations. No administrative penalty related to environmental issues was identified during this audit.
6. The factory had policy to obtain their end client's environmental standards/code requirements and established policy to accord their environmental requirements.
7. The factory had obtained Environmental Impact Assessment (EIA) report and EIA approval certificate. And the factory had provided environmental factor register certificate for review.
8. The factory had made statistic and analysis for the use and discharge of natural resources e.g. water use and electricity use.
9. Based on onsite observation, the main wastes included domestic waste, and production waste scraps, waste chemical containers which were classified and handled properly.

Evidence examined:

Environmental protection management procedure
Pollutant discharge register
EIA and the approval of EIA
Environmental emergency plan
Management interview
Hazard waste treatment records
Test report of boundary waste discharge
ISO14001:2015 management certificate

Any other comments:

Nil

Environmental Analysis

Is there a manager responsible for Environmental issues (Name and Position):	XXXXXXXX / Administration manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The site conducted a risk assessment on the environmental impact of the site activities.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: ISO14001:2015 (certification no.: CN-00222E31347R2M. valid fro May. 06, 2022 to Apr. 13, 2025).
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The environmental policy addressed the key impacts from their operations and their commitment to improvement.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: FSC, certification no.: SGSHK-COC-007823. valid fro Jul. 06, 2020 to Jul. 05, 2025.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had provided environmental impact assessment (EIA) report, EIA approval and construction project completion environment protection acceptance approval for review.

Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: Relevant records and policy were provided for review. The factory had established the policy on storing and using hazardous chemicals.	
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established environment management manual to accord with their client's and local law's environmental requirements.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established policies to reduce energy usage and water usage.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had collected the volume of waste recycling. The records were available for review.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory implemented statistics and analysis for the use and discharge of natural resources, e.g. water use and electricity use.	
Has the facility 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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had checked business partners operating on the premises have appropriate permits and licences and are conducting business in line with environmental expectations of theirs.	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	9268561	0
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Urban water supply system	N/A
Water Volume Used	32016	0
Water Discharged	Urban water drainage system	N/A

Water Volume Discharged	32016	0
Water Volume Recycled	0	0
Total waste produced	144.5 tons	0
Total hazardous waste produced	9.5 tons	0
Waste to recycling	115 tons	0
Waste to landfill	0	0
Waste to other	Domestic waste: 20 tons	0
Total Product Produced	100000000 pieces	0

10C - Business Ethics – 4-Pillar Audit [Summary of Findings]

10C: Compliance Requirements

10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C: Guidance for Observations

10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current Systems:

1. The management policy of integrity and business ethic was established.
2. The factory had designated a senior manager, Mr. Luo Jun / Administration manager as supervisor for integrity and business ethic.
3. The factory had established written procedure to against bribery and corruption and it was clearly communicated to suppliers and clients by email or telephone.
4. The factory had established reporting measures regarding unethical business practices such as suggestion box, email and anonymity complaint hotline.
5. Relevant laws and regulation on business ethic were collected regularly, and the factory had established the policy upon the laws.
6. The policy of concerning bribery, corruption, or unethical Business Practice was delivered to relevant parties.
7. All employees and management could report any unethical Business Ethics by telephone hotline or online website to the local authority without and restrictions.
8. Per management interview and the website review, the factory had not been subjected to any fine/prosecution for noncompliance to Business Ethics regulations.

Evidence examined:



Integrity and business ethic policy
Training record
Management interview
Worker interview

Any other comments:

Nil

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers Please give details: The management policy of integrity and business ethic was published by General manager.
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Trainings were provided for relevant personal, e.g. sales, purchaser, logistics, relevant records were provided for review.
Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policy was updated regularly, per document review and management interview.
Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established written procedure to against bribery and corruption and it was clearly communicated to suppliers and clients by email or fax.

Attachments

 ZAA600042585-Signed CAP.pdf	 ZAA600042585-Photo.pdf
--	---



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgLY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

<https://www.surveymonkey.co.uk/r/BRTVCKP>