

# Sedex Members Ethical Trade Audit Report



Audit Details							
Sedex Company Reference: (only available on Sedex System)	ZC4171476	Sedex Site Reference: (only available on Sedex System)			ZS458	ZS4587633	
Business name (Company name):	ShenZhen YongCha	ngDa l	Bag Co Ltd				
Site name:	ShenZhen YongCha	ngDa l	Bag Co Ltd				
Site address:	Building G, Shenkeng New Industrial Zone, Henggang Street,Longgang District, ShenZhen, Guangdong, China 深圳市龙岗区横岗街道深 坑新工业区厂房G栋 Shenzhen 518173 CN				CN	CN	
Site contact and job title:	Mrs. Huaying Xiong	/HRN	/lanager				
Site phone:	075528638443		Site e-mail:		monic ycd.cc	ca@flourish- om	
SMETA Audit Pillars:	☑ Labour Standards			Environ 4-pillar	ment	Business Ethics	
Date of Audit:	2024-03-25						
Audit Company Name:							
	In	tertek S	Shenzhen				

	Audit Conducted By							
Affiliate Audit Company	$\searrow$	Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi- stakeholder			Combined Audit (	select all that appl	y)			

Audit company: Intertek Shenzhen

Report reference: ZAA600055241

Start Date: 2024-03-25

End Date: 2024-03-27

# **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:	Alex Chow	APSCA Number:	21700347				
Additional Auditors:							
Date of declaration:	2024-03-27						

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:	Mrs. Huaying Xiong				
Title:	HR Manager				
Date of declaration:	2024-03-27				

## Comments:

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

This audit is semi-announced audit with the scheduling window from 18/03/2024 to 29/03/2024.

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# **Summary of Findings**

Issue		a of informity	Number of issues		ues	Findings
(please click on the issue title to go direct to the appropriate audit results by clause)	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.2	§1	1	0	0	NC - ZAF600424573
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid	5.1 5.1	§2 §3	2	0	0	NC - ZAF600396413 NC - ZAF600424574
6 - Working hours are not excessive	6.1 6.1	§4 §5	2	0	0	NC - ZAF600396414 NC - ZAF600424575
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is <u>allowed</u>			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

# **Local Law Issues**

Issue	Description
§1	In accordance with Law of the PRC on Work Safety Article 45, Production and business entities shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use.

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§2	In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.
§3	In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.
§4	In accordance with the 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.
§5	In accordance with the 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.

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# **Site Details**

	Site Details			
Company Name	ShenZhen YongChangDa Bag C	o Ltd		
Site Name	ShenZhen YongChangDa Bag Co Ltd			
GPS location (if available)	GPS Address:	Building G, Shenkeng New Industrial Zone, Henggang Street, Longgang District, Shenzhen City, Guangdong Province, China /中国广东省深 圳市龙岗区横岗街道深坑新工业 区厂房G栋		
	Coordinates:	Latitude: N 22.644, Longitude: E114.180		
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License No.: 9144030006858935X8, Valid date: From May 2013 to long term.			
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Handbag, makeup case			
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Shenzhen YongChangDa Bag Co., Ltd/ 深圳市永昌达手袋有限 司was located at Building G, Shenkeng New Industrial Zone, Henggang Street, Longgang District, Shenzhen City, Guangdong Province, China/中国广东省深圳市龙岗区横岗街道坑新工业区厂房G栋The total area occupied by the facility was about 18500 square meters. They started their operation at existing location in May 2013. A total of 493 employees are currently working in the facility, which includes 473 workers and 20 management. 73 employees (14.8%) were local employees from Guangdong Province, 420 employees (85.20 were domestic migrant workers from Anhui, Hunan, Henan, Hubei, Guangxi, Fujian, Sichuan, Guizhou, Hainan, Yunnan, Chongqing, Ningxia and Jiangxi province of China. No foreig migrant workers. All employees were employed by the facilit directly. All employees worked for 5 days a week in one shift The normal working hours were from 8:00 to 17:30 with 1.5 hours' break for lunch from 12:00 to 13:30. Fingerprint attendance system was used for time keeping for employees Every employee should scan their fingerprint when they wer in or out of the workshop. Employees were calculated on an hourly rated basis which was paid monthly by cash. The peamonth was not obvious according to the management. The facility used one 4-storey building and one 5-storey building and two flat buildings as production workshop, office and			

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Structure and number of buildings

Building Name:		Production	n building#1	
Floor	Descriptio	n	Remark	
1F	Warehous	se	the construction date was 2005	
2F	Packing		the construction date was 2005	
3F	Sewing		the construction date was 2005	
4F	Silk scree	n printing	the construction date was 2005	
Building Name:		Productio	n building#2	
Floor	Descriptio	n	Remark	
1F	Warehous Inspection	se,	the construction date was 2005	
2F	Heatseal a		the construction date was 2005	
3F	Office		the construction date was 2005	
4F	Sewing ar packing	nd	the construction date was 2005	
5F	Sample m	naking	the construction date was 2005	
Building Name:		Productio	n building#3	
Floor	Descriptio	n	Remark	
1F	Cutting		the construction date was 2010	
Building Name:	•	Dormitor	y #1	
Floor	Descriptio	n	Remark	
1F	Kitchen,ca	anteen	the construction date was 2005	
2F-5F	Dormitory	У	the construction date was 2005	
Building Name:		Dormitor	y #2	
Floor	Descriptio	n	Remark	
1F -5F	Dormitory	У	the construction date was 2005	
Building Name:		Electricity Distributi	Transformation an on Room #1	
Floor	Descriptio	n	Remark	
1F	Electricity Transforn and Distri Room	nation	the construction date was 2005	

	Building Name:		Electricity Transformation and Distribution Room #2			
	Floor	Description	n	Remark		
	1F	Electricity Transform and Distri Room	nation	the construction date was 2005		
	Building Name:		Bag makir	ng room		
	Floor	Description	n	Remark		
	1F	Bag makii	ng	the construction date was 2005		
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No					
cracks) observed:	Please give details:					
	During facility tour, r	no cracks o	f buildings	were observed.		
Does the site have a structural engineer evaluation?	☑ Yes □ No					
evaluations	Please give details:					
	The report of construction completion acceptance provided for review.					
Site function	□ Agent			ry sing/Manufacturer		
	☐ Finished Product Supplier ☐ Grower					
	☐ Homeworker		□ Labou	ır Provider		
	□ Pack house		□ Prima	ry Producer		
	☐ Service Provider		□ Sub-co	ontractor		
Months of peak season						
Process overview	Cutting, Gluing, Silk s Packing	screen prin	ting, Heat s	seal, Sewing and		
What form of worker representation is there on site?	□ Union		Worker     Wo	er Committee		
there on site:	□ Other		□ None			
Please give details:	Worker committee o	f Shenzhen	YongChan	igDa Bag Co., Ltd		
Is there any night production work at the site?	☑ Yes □ No					
Are there any on site provided worker accommodation buildings	☑ Yes □ No					
	Please give details:					
	About 50% employee	es live in do	rmitory bu	ilding.		
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No					
accommodation buildings	Please give details:					
Were all site provided accommodation buildings included in this audit	☑ Yes □ No					
bananigs included in this addit	Please give details:					

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Audit Parameters						
Time in and time out	Day 1		Day 2	Day 2		
	In	09:09	In	08:39	In	08:32
	Out	17:15	Out	16:50	Out	13:50
Audit type:	PERIOD	IC				
Was the audit announced?	SEMI_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	Mrs. Huaying Xiong / HR Manager					
Is further information available	No					

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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 trade union in the facility.				
Reason for absence during the audit	There was no trade union in the facility.				
Reason for absence at the closing meeting	There was no trade union	in the facility.			

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# **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		
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	workers	Total
Worker numbers – male	33	0	0	179	0	0	0	212
Worker numbers – female	30	0	0	231	0	0	0	261
Total	63	0	0	410	0	0	0	473
Number of Workers interviewed – male	3	0	0	10	0	0	0	13
Number of Workers interviewed – female	3	0	0	10	0	0	0	13
Total – interviewed sample size	6	0	0	20	0	0	0	26

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	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?	☐ Yes ☑ No	
	Please give details:	
	No peak season in the facility.	
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

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Worker Interview Summary		
Were workers aware of the audit?	☐ Yes ☑ No	
Were workers aware of the code?	☑ Yes □ No	
Number of group interviews:	20 employees (4 groups of 5)	
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.	✓ Yes □ No Please give details:	
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes □ No	
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent	
What was the most common worker complaint?	Nil	
What did the workers like the most about working at this site?	Wages are paid on time and in compliance with legal requirements.	
Any additional comment(s) regarding interviews:	Nil	
Attitude of workers to hours worked:	Generally acceptable.	
Is there any worker survey information available?	☐ Yes ☑ No Please give details:	

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#### Attitude of workers:

26 employees were randomly selected for interview including 13 male employees and 13 female employees, and they were interviewed as 4 groups of 5 and the balance of 6 employees were interviewed individually. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility, and all employees were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They can make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.

#### Attitude of worker's committee/union reps:

There was no union in the facility. One worker committee with 3 worker representatives and one worker representative was interviewed. The interviewed worker representative was favourable with the management and the working conditions and stated that they could give suggestions on all parts of the site's practices, and the facility management would investigate their suggestions or concerns and respond to them in a timely manner.

## Attitude of managers:

The management was open and cooperative throughout the process of the audit. The audited facility designated several management staff to be responsible for this audit, e.g. the facility assigned the tasks of coordinating the whole audit, accompanying the onsite tour, providing documents and arrangement of worker interviews etc. to several different management staff, and these assigned persons completed their assigned tasks well during the whole audit. The requested documents were provided in a timely manner.

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# 0A - Universal Rights covering UNGP [Summary of Findings]

Version 6.1

OA: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

# **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 facility had established a written Human Rights Policy covering human rights impacts and issues and expressing commitment to respect human rights. The facility communicated Human Rights Policy to all appropriate parties including its own suppliers through providing the facility's Human Rights Policy to all appropriate parties and asking them to acknowledge Human Rights Policy Compliance Commitments by signatures and stamps.

2.There was one designated person responsible for implementing standards concerning Human Rights in the facility and the designation paper was available for review. The designated person for it was Ms.

Huaying Xiong/ HR Supervisor.

3. The facility had assessed and measured the human rights impacts and issues of its stakeholders once per year and the facility's conclusion was that no salient negative human rights impact or issue was found in their stakeholders.

4.The facility had assessed and measured its direct, indirect and potential human rights impacts on its stakeholders once per year and the facility's conclusion was that there was no salient negative impact of human rights on its stakeholders.

5.According to worker interviews, management interviews and the facility's regular assessment and measurement of its direct, indirect and potential human rights impacts on its stakeholders, the facility had no adverse impact of human rights on its stakeholders.

6.The facility had established a transparent system for confidentially reporting and dealing with human rights impacts without fear of reprisal towards the reporter. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for its employees and other stakeholders to report human rights relevant complaints without fear of reprisal and such kind of information was publicized through posters and regular trainings. The designated person for it was Ms. Huaying Xiong/ HR Supervisor.

#### **Evidence examined:**

1.The facility's written Human Rights Policy; Human Rights Policy Compliance Commitments from its appropriate parties.

2. The designation paper for person responsible for implementing standards concerning Human Rights in the facility.

3.The assessment and measurement reports regarding the human rights impacts and issues of its stakeholders.

4.The assessment and measurement reports regarding its direct, indirect and potential human rights impacts on its stakeholders.

5. The worker interviews and management interviews

6.The posters and trainings records about Human Rights Policy.

#### Any other comments:

Nil

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Policy statement that expresses commitment to respect human rights?	☑ Yes □ No	
commence to respect named rights.	Please give details:	
	The facility had established a written Human Rights Policy covering human rights impacts and issues and expressing commitment to respect human rights.	
Are the policies included in workers' manuals?	☑ Yes □ No	
manuais:	Please give details:	
	The policies included in workers' manuals.	
Does the business have a designated person responsible for implementing	☑ Yes □ No	
standards concerning Human Rights?	Please give details:	
	Any issue concerning human rights could be raised to the designed responsible person. Name: Ms. Huaying Xiong, Job title: HR Supervisor.	
Does the business have a transparent system in place for confidentially	☑ Yes □ No	
reporting, and dealing with human rights	Please give details:	
impacts without fear of reprisals towards the reporter?	The reporter's personal information would not be revealed, and the reporting practice would never effect the working arrangement or promotion/position.	
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes □ No	
Does the business demonstrate effective data privacy procedures for workers'	☑ Yes □ No	
information, which is implemented?	Please give details:	
	The personnel files were preserved by HR and would not disclose without authorization.	
Measuring Workplace Impact		
Annual worker turnover(Number of	Last year 5.0%	
workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	This year 5.0%	
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])	5.0%	
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 3.0%	

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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?	☑ Yes □ No	
	Please give details:	
	The facility had an accident con root cause analysing, corrective Additionally, HR staff would res keeping. However, no accident months.	e and preventive actions etc. ponsible for accident report
Annual Number of work related	Last year	0.0%
accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	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	Last year	0.0%
workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	This year	0.0%
% of workers that work on average more	6 month	0.0%
than 48 standard hours / week in the last 6 / 12 months	12 month	0.0%
% of workers that work on average more	6 month	0.0%
than 60 total hours / week in the last 6 / 12 months	12 month	0.0%

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## **OB - 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:**

The facility implements and maintains systems for delivering compliance to this Code.

2.The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.

3.Ms. Huaying Xiong/HR Supervisor was assigned to responsible for implementation of the Code.

4. Business license was updated.

5. The facility communicated this Code to all employees by regular trainings.

6.The facility communicated the code to their suppliers through providing copy of CSR manual and asking suppliers to sign the written social compliance commitments; and the facility also conducted social compliance assessments for its suppliers annually.

#### **Evidence examined:**

1. A employee manual created by the facility which contained all required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements.

2. Appointment papers for compliance responsible persons.

3. Internal audit documents (e.g. annual audit reports) from the internal audit team.

Training records for employees.

5. Written social compliance commitments from Suppliers and social compliance assessment reports for its suppliers.

6. Management interview and employee interview.

Any other comments:		
lil		

	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 fine or prosecution for non-compliance to any regulation was found for the facility.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<ul> <li>✓ Yes □ No</li> <li>Please give details:</li> <li>The facility had established the policies and procedures for forbidding forced labour, child labour and discrimination, harassment and abuse.</li> </ul>
If Yes, is there evidence (an indication) of effective implementation? Please give details.	The facility had provided relevant written training records for employees.

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Have managers and workers received training in the standards for forced	☑ Yes □ No
labour, child labour, discrimination,	Please give details:
harassment & abuse?	The facility provided regular trainings in the standards for forbidding forced labour, child labour, discrimination, harassment and abuse for both management and workers.
If Yes, is there evidence (an indication)	☑ Yes □ No
that training has been effective e.g. training records etc.? Please give details	Please give details:
	Regular training records were provided for review. The employees were aware clearly of the facility's relevant policies and procedures according to the interviews.
Does the site have any internationally	☐ Yes ☑ No
recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or	Please give details:
other social audits)?	No any internationally recognised system certifications
Is there a Human Resources	☑ Yes □ No
manager/department?	The facility had Human Resources department which in charge of the recruitment of employees, assignment of employees' post, etc. There was one Human Resources Supervisor in the facility.
Is there a senior person /manager responsible for implementation of the	☑ Yes □ No
code?	Please give details:
	Ms. Huaying Xiong/HR Supervisor was assigned to responsible for implementation of the Code.
Is there a policy to ensure all worker information is confidential?	☑ Yes □ No
information is confidential.	Please give details:
	The facility had established policy to ensure all employees' information were confidential.
Is there an effective procedure to ensure confidential information is kept	☑ Yes □ No
confidential?	Please give details:
	All employees' personal information would be kept and only accessed by authorized staff, such as HR.
Are risk assessments conducted to evaluate policy and procedure	☑ Yes □ No
effectiveness?	Please give details:
	Risk assessment would be conducted regularly to evaluate policy and procedure effectiveness.
Does the facility have a process to address issues found when conducting	☑ Yes □ No
risk assessments, including implementation of controls to reduce	Please give details:
identified risks?	Any risk identified during assessment would be corrected immediately.

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Does the facility have a policy/code which require labour standards of its own	☑ Yes □ No
suppliers?	Please give details:
	The facility had its supplier filter program to ensure all suppliers in compliance with legal requirements regarding labour standards.
	Land Rights
Does the site have all required land	☑ Yes □ No
rights licenses and permissions (see SMETA Measurement Criteria)?	Please give details:
	Through document review and management interview, auditor found that the facility had provided the land rights licenses such as property ownership certificate for the facility building. (remark: the building was not owned by the facility, and the facility just rented the building to use).
Does the site have systems in place to	□ Yes ☑ No
conduct legal due diligence to recognize and apply national laws and practices	Please give details:
relating to land title?	Not applicable, no such national law requirement.
Does the site have a written policy and procedures specific to land rights?	□ Yes ☑ No
procedures specific to land rights:	Please give details:
	Remark: The land in China mainland was belonged to the nation. Anybody or facility, no matter the character, could only rent the land from governmental department for a period. If the facility 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	☑ Yes □ No
compensated the owner/lessor for the land prior to the facility being built or	Please give details:
expanded?	The document was provided for review.
Does the facility demonstrate that alternatives to a specific land acquisition	☑ Yes □ No
were considered to avoid or minimize	Please give details:
adverse impacts?	Not applicable, the facility did not have a plan of land acquisition.
Is there any evidence of illegal appropriation of land for facility building	☑ Yes □ No
or expansion of footprint?	Please give details:
	No illegal appropriation of land for facility building or expansion of footprint.

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## 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. The facility has a policy which prohibits forced labour and this was available for review, the facility did not use prison labour.

2. There was a non-formalised application procedure which states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original given back to the

3. The employee handbook – given to all workers on joining, states that workers within their probation period are free to leave with 3 days written notice and once a worker is permanent (this is out of probation) they can resign from the facility with one month's prior written notice, given to their supervisor or the personnel office. The handbook also states that they will be given their full wages on their last day of work.

4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.

5. The facility did not require any payment for work tools, PPE, training, etc.

6. The above was confirmed in management and employee interview.

#### **Evidence examined:**

- 1. Personnel files (all were checked)
- 2. Facility rules
- 3. Employee handbook
- 4. Management and employee interview.

any other comments:	
lil en	

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No  Please give details:  No case of restriction on workers' freedom to terminate employment was found.

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If any part of the business is UK based or registered there & has a turnover over	☐ Yes ☐ No ☑ Not Applicable		
£36m, is there a published a 'modern day	Please give details:		
slavery statement?	The facility was in China and did not register in UK.		
Is there evidence of any restrictions on workers' freedoms to leave the site at the	☐ Yes ☑ No		
end of the work day?	Please give details:		
	Through employee interview, the workers' freedoms were not restricted.		
Does the site understand the risks of forced / trafficked / bonded labour in its	☑ Yes □ No □ Not Applicable		
supply chain	Please give details:		
	Through employees' interview and document review, the facility had established relevant policy and provided relevant training to all employees.		
Is the site taking any steps taking to reduce the risk of forced / trafficked	☑ Yes □ No		
labour?	Please give details:		
	According to the document review and management interviews, there was no risk of forced / trafficked / bonded labour in its supply chain.		

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# 2 - Freedom of Association and Right to Collective Bargaining are Respected [Summary of Findings]

Version 6.1

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
- 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.The facility had a written policy of freedom of association and right to collective bargaining. The policy stated that the workers were free to form or join trade union or workers' organisation and enjoyed the right to collective bargaining, and nobody would be treated differently if they were members of the trade union or workers' organisation, etc.
- 2.The facility had a written policy about suggestions and appeals, which stated that workers could raise their suggestions, concerns or appeals through EHS committee representatives, telephone, suggestion box, and their team leaders or above; or through worker representatives who would take it to the management.
- 3.There was no union, but one worker committee with three worker representatives were established in the facility. The worker representatives conducted meetings regularly and the latest meeting was conducted on 23 February 2024. Three worker representatives were present at the opening meeting, the audit and the closing meeting.
- 4.The interviewed workers confirmed that they were free to join trade union or workers' organisation and enjoyed the right to collective bargaining.
- 5. The interviewed worker representative confirmed that the facility did not interfere in their activities and did not discriminate the worker representatives.

# **Evidence examined:** 1.Policy of freedom of association and right to collective bargaining 2.Policy about suggestions and appeals 3. Worker representatives' selection records and meeting records 4. Response records for workers' suggestions and appeals 5.Interviews with worker representative, management and workers. Any other comments:

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 committee of Shenzhen	YongChangDa Bag Co., Ltd
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No	

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Nil

Is there any other form of effective worker/management communication channel? (Other than union/worker	☑ Yes □ No		
	Please give details:		
committee e.g. H&S, sexual harassment)	Through EHS committee representatives, telephone, suggestion box, and their team leaders or above, etc.		
Is there evidence of free elections?	☑ Yes □ No		
Does the supplier provide adequate facilities to allow the Union or committee	☑ Yes □ No		
to conduct related business?	Please give details:		
	The facility provided the meeting room for the worker committee's regular meetings.		
Name of union and union representative, if applicable:	Not applicable, there was no trade union in the facility.		
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable		
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	One worker committee with 3 worker representatives was established in the facility.		
Is there evidence of free elections?	☑ Yes □ No □ Not Applicable		
Are all workers aware of who their representatives are?	☑ Yes □ No		
representatives are.	Please give details:		
	The interviewed workers confirmed that the worker representatives were selected by them, so they were aware clearly of who their representatives.		
Were worker representatives freely elected?	☑ Yes □ No		
Date of last election:	2024-01-26		
Do workers know what topics can be raised with their representatives?	☑ Yes □ No		
Were worker representatives/union representatives interviewed?	☑ Yes □ 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.	The latest meeting between the worker representative and management was conducted on 23 February 2024, topic regarding the sanitation and new employees issue was discussed, and the meeting minutes were posted on public board for employees' acknowledgement.		
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No		

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

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.General Health and Safety management
- Written Health and Safety Policy and Health and Safety Manual were established and implemented.
- Mr. Weitao Shen/Manager was the appointed person for the facility's health and safety issues.

- Minutes of meetings showed that there were quarterly meetings between the H&S committee (workers) and the Health and Safety Officer, and each point was acted on.
- Potable water was freely available on each facility floor and test certificates were up-to-date.

- Sufficient clean toilets segregated by gender were available always to workers.
- Ventilation, temperature and lighting were adequate for each facility area. Air level was acceptable per the occupational hazards factors testing report.

- Accident reports were available for review.

- Non-compliance found: 1) Employees did not properly wear PPE (Personal Protective Equipment). During facility tour, auditor

found that 4 out of 10 silk-screen printing employees working in the silk-screen printing workshop on the 4th floor of the 4-storey production building did not wear the rubber gloves and active carbon mask which were provided by facility.

2. Fire Safety

- Valid fire safety certificate was available for the facility building.

- There were at least 2 safety exits from each facility floor.

- The facility's fire prevention related facilities included (1) fire extinguishers; (2) fire hydrants; (3) emergency lights; (4) safety exit signs; (5) lit evacuation signs; (6) evacuation plan; (7) emergency assembly point sign; (8) anti-explosion lights, etc.

- Fire prevention related facilities were valid, sufficient and maintained well, and the monthly inspection records were available for review.

The open directions of the safety exit doors were adequate.
Evacuation routes were designed well with yellow lines and unblocked.

- Evacuation plan was posted at each safety exit and understood by all interviewed workers.

- Fire drills were organised and recorded every year in the facility, and the latest one was conducted on 27 February 2024. All workers attended these fire drills.

Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse
- There was one electrician with the valid qualification certificate in the facility.
- Warning signs were posted on the electrical panels.

Medical services

- There were adequate first aid kits and they were well stocked.
- There were at least one first aider for each workshop in the facility.

# **Evidence examined:**

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1. Health and safety policy, manual 2. Health and safety committee minutes
3. Potable water testing report
4. Toilet cleaning records
5. Accident reports
6. Fire certificate
7. Fire prevention facilities' regular maintenance and inspection records
8. Fire drill records
9. Electrical equipment maintenance and inspection records 10. The certificate of the electrician
11. Chemical safety training records 12. Chemical list for each chemical
13. Trained first aiders' records
14. Onsite observation
15. Interviews with Management
16. Interviews with workers and H&S committee members
Any other comments:
Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and	☑ Yes □ No
	Please give details:
are these communicated to workers?	The facility had established general Health & Safety and occupational Health & Safety policies and procedures and employees would be given relevant training on their entry date.
Are the policies included in workers' manuals?	☑ Yes □ No
manaas:	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)?	☐ Yes ☑ No
	Please give details:
	No any structural addition without required permits/ inspections in the facility. The site had a valid building safety certificate, and the floors showed in the building structure safety certificate was consistent with the floors of the facility's buildings.
Are visitors to the site informed on H&S and provided with personal protective equipment?	☑ Yes □ No
	Please give details:
	All visitors would be introduced with H&S and provided with personal protective equipment if necessary.
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))	☑ Yes □ No
	Please give details:
	No medical room was available in the facility and no such legal requirements. However, there were first aid kits with adequate first aid supplies in the facility.

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Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☑ Yes □ No
	Please give details:
	There was no doctor or nurse in the facility; and doctor and nurse were also not required legally for the facility. There were total 5 trained first aiders in the facility. The first aiders were trained in the local hospital regularly.
Where the facility provides worker	☐ Yes ☑ No
transport – is it fit for purpose, safe, maintained and operated by competent	Please give details:
persons e.g. buses and other vehicles?	The facility did not provide worker transport.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	☑ Yes □ No
	Please give details:
	Secure personal storage space provided for workers in their living room.
Are H&S Risk assessments are conducted	☑ Yes □ No
(including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	Please give details:
	H&S Risk assessments were conducted and some measures were taken to reduce identified risk.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☑ Yes □ No
	Please give details:
	The facility obtained legally required environmental protection records.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☑ Yes □ No
	Please give details:
CHETHICAIS!	The facility met its customer requirements on environmental standards. The facility provided the trainings to both management staff and non-management workers and implemented the updated & strictest environmental and chemical standards in the facility.

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	Non-Comp	liance			Evidence
[Back to findings	summary]				
	Non-Compl	liance		1	
Status	OPEN			1	
Reference	ZAF600424573			1	
Clause	3 - Working Condition	ns are Safe a	and Hygienic	1	
Issue Title	278 - Personal Prote but incidents of wor appropriate	ctive Equipm kers not usin	ent (PPE) provided g PPE where		
Subcategory	Personal Protective	Equipment/C	lothing	1	
New or carried over?	☑ New	□ Ca	arried Over		
Root cause	<ul><li>☑ Training</li><li>☐ Costs</li><li>☐ Other</li></ul>	-	stem ck of workers		
Root cause - Other					
Local law issue	In accordance with L Article 45, Productio provide their employ that are up to nation specifications, and the employees and see to gears in accordance	on and busine yees with wo nal standards hey shall give to it that they	ess entities shall rk protection gears or industrial instruction to their wear or use these		
ETI code	3.2 - Workers shall ro Health & Safety train repeated for new or	ning, and suc	h training shall be		NC-Silk scrren printing employees did not properly wear the provided PPE.JPG
Explanation to the non compliance	Employees did not p Protective Equipmer found that 4 out of 1 working in the silk-s 4th floor of the 4-sto wear the rubber glo which were provided 动防护用品。现场审核 4楼丝印车间10名正在 企业提供的活性炭口罩	nt). During far 10 silk-screen creen printin orey production ves and activ d by facility. 该时审核员发现 工作的丝印员	cility tour, auditor printing employees g workshop on the on building did not e carbon mask 员工未按要求佩戴劳 见在1栋4层的生产楼		<u>provided (                                  </u>
Follow up method	☐ Follow up audit	☑ De	esktop audit		
Timescale	☐ Immediate ☑	30 days	□ 60 days		
	□ 90 days □	120 days	□ 180 days		
	□ 365 days □	Other		▎▐	
Actions	It is recommended the and train the employ the facility should endersure that all occupemployees wear the (PPE) in work.	yees on prop nhance onsite pational haza	erly wearing PPE. e inspection and ord factor contacting		

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## 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. There was a written recruitment procedure which states that workers must present their ID cards for proof of age but only copies must be kept in the personnel files and the original ID cards will be given back to the workers; and the facility will never employ and use any child labour under the age of 16 years
- There was a written juvenile worker and pregnant worker protection procedure though there was no juvenile worker or pregnant worker in the facility.
- 3. There was a written child labour remediation procedure though there was no child labour in the facility.

4. The written worker roster was available.

- 5. The worker' personnel files include recruitment date, a bio-data sheet, a recent photo and the age documentation (i.e. copy of the ID card). The ID card copy lists the worker's name, household address and the date of birth. The workers' personnel files showed that the youngest worker was 19 years old.

  6. Management interview and worker interviews showed that the facility verified all workers' original ID
- cards at the time of recruitment and kept the photocopies of workers' ID cards in the personnel files, and the facility would not recruit the applicant under the age of 16 years old.

## Evidence examined:

- 1.Recruitment procedure
- 2. Juvenile worker and pregnant worker protection procedure
- 3.Child labour remediation procedure
- 4.Worker roster
- 5.Personnel files
- 6.Management interview and worker 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?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No  Please give details:  Not applicable, there was no worker under 18 years old.

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## 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:**

Wage & benefit policy and controlling procedure were established and implemented.

2. As per management interview and employees' interview, all employees were paid on or before 7th of

each month by cash.

3. Adequate wages and attendance records were kept in the facility, So, randomly sampled 26 employees' payrolls and attendance records from February 2024 (current month), October 2023 (random month) and May 2023 (random month), and those 26 employees' attendance records from 8 April 2023 (the last audit was conducted on April 6-7, 2023) till 27 March 2024 (audit day month) for further checking on status of wages and working hours.

4. The number of workers on payroll records was consistent with the number of workers in the employee

All employees' wages were calculated on hourly-rate basis.

6. All employees were provided with written and understandable information about their employment conditions in respect to wages before they entered employment.

7. The local minimum wage standard was set at RMB 2360 per month equivalent to RMB 13.56 (2360/21.75/8) per hour since 01 January 2022.

8. No inconsistency regarding the workers' wages and working time was found between the payrolls, the attendance records, the production related records and worker interviews, etc.

9. Not all employees had participated in legally required social insurances.

# Evidence examined:

- 1.Wage & benefit policy and controlling procedure
- 2. Training records about wage and benefit policy and controlling procedure
- 3. Local legal minimum wage documents
- 4 Local and national laws

5. Labour contracts for all workers

- 6. Payroll records from March 2023 to February 2024 (current month) and attendance records from 8 April 2023(the last audit was conducted on April 6-7, 2023) to 27 March 2024 (the audit day) were available for
- 7. Insurance payment receipts
- 8 Leave records
- 9. Resignation records
- 10. Disciplinary records
- 11. Production records such as daily production quantity records, inspection records and material receiving and issuing records were reviewed and consistent with the attendance records and payrolls provided
- 12. Worker interview and management interview.

# Any other comments:

Nil

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Summary Information			
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: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 176.0	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: 20.0 Per Month: 82.0	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: null Per Week: null Per Month: 2360	Actual Per Day: 133.33 Per Week: 666.66 Per Month: 2900	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: 0 Per Week: 0 Per Month: 0	NO
	Wages Analysis:		
Were accurate records shown at the first request?	☑ Yes □ 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)	26 samples from February 2024 (current month) 26 samples from October 2023 (random month) 26 samples from May 2023 (random month)		
Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No		
If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ Please give details:	Not Applicable	
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☐ Meet ☑ Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	at least RMB 2900 per month since 01 March 2023 in the sampled months.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Nil 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:	insurance, maternity	sic endowment insura / insurance, unemploy nsurance, Personal in	ment insurance and

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Have these deductions been made?	☐ Yes ☑ No
Please list all deductions that have been made.	Nil
Please list all deductions that have not been made.	The personal income tax not deducted due to the wage level did not reach the deduction line, the facility paid social insurance.
Were appropriate records available to verify hours of work and wages?	☑ Yes □ No
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No
Do records reflect all time worked? (For instance, are workers asked to attend	☑ Yes □ No
meetings before or after work but not	Please give details:
paid for their time)	All employees must scan their finger- print when they time in/out, no incomplete or inconsistent record was noted.
Is there a defined living wage: This is not normally minimum legal	☐ Yes ☑ No
wage. If answered yes, please state amount and source of info:	Please give details:
Please see SMETA Best Practice Guidance and Measurement Criteria.	
If yes, what was the calculation method	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage
used.	☐ Figures provided by ☐ Living Wage Foundation UK
	☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation
	☐ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is	☑ Yes □ No
consideration to basic needs of workers plus discretionary income).	Please give details:
plus discretionary income).	The facility conducted internal social compliance audit regularly, which covered the review of the workers' wages, the local legal minimum wage standards and basic needs of workers plus discretionary income, etc.
Are workers paid in a timely manner in line with local law?	☑ Yes □ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes □ No
Seeing para for equal work.	Please give details:
	Through facility rules review, payroll records review and employees' interview, it was confirmed that equal rates were being paid for equal work.
How are workers paid:	☑ Cash ☐ Cheque
	☐ Bank Transfer ☐ Other

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	Non-Compliance	Evidence
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	Non-Compliance	
Status	CLOSED	
Reference	ZAF600396413	
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?	☐ New ☑ Carried Over	
Raised by audit	ZAA600008036	
Resolved by audit	ZAA600055241	
Root cause	☑ Training ☑ System	
	☑ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.	
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	Insufficient social insurance participated. Through reviewing of social insurance receipt of March 2023, auditors found that 161 out of 425 employees	

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	(including 91 retirement employees) had participated in basic endowment insurance; 214 employees had participated in employment injury insurance, unemployment insurance and maternity insurance; 215 employees had participated in basic medical insurance. Remark: The facility provided the commercial insurances for 230 employees in accidental injury insurances from 27th April 2022 to 21st April 2023.
	社保不足。通过审查2023年3月的社会保险收据发现 ,425名员工中有161人(包括91名退休员工)参加了基 本养老保险;214名员工参加了工伤保险、失业保险和生 育保险;215名员工参加了基本医疗保险。备注:企业为 230名员工提供了意外伤害保险商业保险,有效期为 2022年4月27日至2023年4月21日。
Follow up method	☑ Follow up audit ☐ Desktop audit
Timescale	□ Immediate □ 30 days ☑ 60 days
	□ 90 days □ 120 days □ 180 days
	□ 365 days □ Other
Actions	It was recommended that the facility would ensure all employees participate in social insurance according to the Law.
Additional comments	1. Strengthen the publicity of the latest social security information and strengthen worker training. 2. In order to encourage employees to purchase social insurance, the company will pay all social insurance purchase fees (including the part payable by individuals) for 3 months every year for employees who voluntarily purchase social insurance.  No corrective action was taken. Non-compliance of Insufficient social insurance participated. During this audit was raised as new finding in order to ensure it can be shown in CAP & Audit Report. Please refer to the new finding in the report for details.

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	Non-Compliance	
Status	OPEN	
Reference	ZAF600424574	
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?	☑ New ☐ Carried Over	
Root cause	☑ Training ☐ System	
	☑ Costs ☐ Lack of workers	
	□ Other	
Root cause - Other		
ETI code	In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.	NC-Insufficient socia insurance participated.pdf
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	Insufficient social insurance participated. Through document review, auditor found that there were 467 employees (including 118 retirement employees) in February 2024, and 349 employees were eligible for the 5 types of social insurance, only 172 employees had participated in endowment insurance, 213 employees had participated in medical insurance,	

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	injury insurance unemployment purchased com employees fron from April 22, 2 足。通过文件审标 业的467个员工中 有349人,只有1 , 212人参加生育 其他员工在中国	n China Life Insura 023 to April 21, 20 陔 (2024年2月社保 P有118名返聘人员 72人参加养老保险 保险, 失业保险和コ	ance and es, the facility nsurance for other ance Co., Ltd., valid 024. 社会保险参保不 记录), 审核员发现企 , 符合参加5种保险的 , 213人参加医疗保险 , 伤保险, 此外, 企业为 了商业意外伤害险, 有	
Follow up method	☑ Follow up au	ıdit 🗆 De	esktop audit	
Timescale	□ Immediate	□ 30 days	☑ 60 days	
	□ 90 days	☐ 120 days	□ 180 days	
	□ 365 days	□ Other		
Actions	It is recommended that the facility should ensure all employees participate in social insurance according to the Law. Facility would communicate with employees to expand the social insurance coverage. Ensure to expand the social insurance coverage to comply with the law.			

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#### 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. Working time policy and controlling procedure were established and implemented.

2. Voluntary overtime policy was set up and overtime was voluntary.3. Working time policy and controlling procedure were communicated to the workers through regular

- 4. Working time was recorded, kept and provided for reviewing.5. The workers' attendances were recorded by Fingerprint attendance system and the shift start time and shift end time were recorded accordingly.
- 6. Based on the provided attendance records and payrolls as well as worker interviews, standard normal working hours were 8 hours per day and 40 hours per week; at least 1 day off in a week was assured; the weekly working time was within 60 hours; and the status of overtime hours in samples was as below: 0-2 hours per day, 0-20 hours per week and 28-30 hours per month in February 2024 (current month); 0-2 hours per day, 0-20 hours per week and 78 hours per month in October 2023 (random month);
- 0-2 hours per day, 0-20 hours per week and 82 hours per month in May 2023 (random month).

# **Evidence examined:**

- 1. Working time policy and controlling procedure
- 2. Voluntary overtime policy
- 3. Employees contracts
- 4.Local and national laws
- Attendance records from 08 April 2023 to 27 March 2024 (audit day) were available for review.
- 6. Cross-checking the attendances between the attendance records and production records such as daily production quantity records, inspection records and material issuing records etc.
- Sample pay slips with recorded hours of all employees interviewed
- 8. Employée interview and management interview.

# Any other comments:

Nil

Working hours' analysis		
Systems & Processes		
What timekeeping systems are used?	Finger printing system	

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Is sample size same as in wages section?	☑ Yes □ 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.)	☑ Yes □ No			
Are there any other types of contracts/employment agreements used?	☐ Yes ☑ 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.)	☐ Yes ☑ No			
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days     □ 2 in 14 days    □ No (please explain)			
Is this allowed by local law?	☑ Yes □ 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)	☐ Yes ☑ 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.)	□ Yes ☑ No			
	Overtime Hours worked			
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day, 20 hours per week and 30 hours per month in February 2024 (current month); 2 hours per day, 20 hours per week and 78 hours per month in October 2023 (random month); 2 hours per day, 20 hours per week and 82 hours per month in May 2023 (random month).			
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No  Please give details:  The maximum weekly working hours were 60.			
Approximate percentage of total workers	100.0%			
on highest overtime hours:				

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Is overtime voluntary? (Please detail	☑ Yes □ No □ Conflicting Information		
evidence e.g. Wording of contract / employment agreement / handbook /	Please give details:		
worker interviews / refusal arrangements)	Through employees' interviews, all selected employees stated that they worked overtime on their willing. And they could refuse to work overtime if they did not want to. Through handbook review, it was noted that the facility did not use monetary penalties as disciplinary means.		
	Overtime premium		
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☑ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium		
5 ,	Please give details:		
	Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% of the normal wages were provided for the overtime hours on weekdays, rest days in sampled months, and 300% of the normal wages would be paid if overtime happened on statutory holidays.		
Is overtime paid at a premium?	☑ Yes □ No		
	1.Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% of the normal wages were provided for the overtime hours on weekdays, rest days in sampled months, and 300% of the normal wages would be paid if overtime happened on statutory holidays.  2. The workers' wages including normal wages and overtime wages etc. of one month was paid on or before the 7th day of the following month.		
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.	☐ No ☐ Consolidated ☐ Collective ☐ Bargaining ☐ agreements ☐ Other		
Please give details	Not applicable. As Per the Wage & benefit policy and		
Trease give details	controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% of the normal wages were provided for the overtime hours on weekdays, rest days in sampled months, and 300% of the normal wages would be paid if overtime happened on statutory holidays.		
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 shocked boxes above a glidatail of	☐ Overtime is Voluntary Described D		
any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Site can ☐ Other reasons demonstrate (please specify) exceptional circumstances		
Please give details	N/A, the maximum weekly working hours were 60 hours.		
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A, the maximum weekly working hours were 60 hours.		

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Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☑ Yes ☐ No According to management interview, overtime hours were caused by labour shortages and tight delivery date of the purchase orders, etc.
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No

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	Non-Compliance	Evidence
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	Non-Compliance	
Status	CLOSED	
Reference	ZAF600396414	
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?	☐ New ☐ Carried Over	
Raised by audit	ZAA600008036	
Resolved by audit	ZAA600055241	
Root cause	☐ Training ☐ System	
	☑ Costs ☑ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the 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	Overtime hours exceeded the legal requirement. Auditors noted that the monthly overtime hours of 26 out of 26 random selected employees were 76-80 hours in February 2023 (current month); the monthly overtime hours of 26 out of 26 random selected employees were 96 hours in October 2022 (random month); the monthly overtime hours of 26 out of 26 random selected employees were 92 hours in July 2022 (random month), which did not comply with the PRC Labour Law article 41 exceeded the monthly overtime hours 36 hours.  加班时间超过了法定要求。2023年2月(当月),26名	

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Follow up method	随机选择的员工中有26人每月加班时间为76-80小时;2022年10月(随机月),26名随机选择的员工中有26人的月加班时间为96小时;2022年7月(随机月),26名随机选择的员工中有26人的月加班时间为92小时,不符合《中华人民共和国劳动法》第41条规定,超过了月加班时间36小时。  ☑ Follow up audit □ Desktop audit	
Timescale	□ Immediate       □ 30 days       □ 60 days         □ 90 days       □ 120 days       □ 180 days         □ 365 days       □ Other	
Actions	It was recommended that the facility would reduce the overtime hours to ensure it was within 36 hours per month and 3 hours per day.	
Additional comments	Through the management meeting, our company has established a new "working hours management procedure", and appointed Xiong Huaying as the representative of the working hours manager to conduct regular working hours training for employees and monthly statistics of the working hours of each department to reasonably control the number of overtime hours. And the factory will consider using the following 4 methods to gradually reduce the overtime hours of workers:  1. Various departments have been recruited, combined with the current order quantity, a corresponding plan for recruiting personnel has been formulated  2. Make statistics on the working hours and compare them with the orders, arrange the orders more reasonably, and receive orders according to the capacity;  3. Increase suppliers to ensure timely supply of raw materials.  No corrective action was taken. Non-compliance of Overtime hours exceeded the legal requirement.  During this audit was raised as new finding in order to ensure it can be shown in CAP & Audit Report.  Please refer to the new finding in the report for details.	

	Non-Compliance	Evidence
[Back to findings	summary]	
	Non-Compliance	
Status	OPEN	
Reference	ZAF600424575	
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?	☑ New ☐ Carried Over	
Root cause	☐ Training ☐ System	
	☐ Costs ☑ Lack of workers	
	□ Other	
Root cause - Other		
Local law issue	In accordance with the 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.	NC-Overtime hours exceeded the legal requirement.pdf
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	Overtime hours exceeded the legal requirement. Through document review, auditor found that the monthly overtime hours of 26 out of 26 randomly selected employees were 78 hours in October 2023 (random month) and 26 out of 26 randomly selected employees were 82 hours in May 2023 (random month). 加班时间超过法规要求。通过文件审核,审核员在2023年10月(随机月)随机抽取26名员工中有26人的月加班为78小时和2023年5月(随机月)随机抽取26名员工中有26人的月加班为82小时.	
Follow up method	☑ Follow up audit ☐ Desktop audit	1
Timescale	☐ Immediate ☐ 30 days ☐ 60 days	
	□ 90 days □ 120 days □ 180 days	
	☐ 365 days ☐ Other	

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		Actions	Facility would reduce the overtime hours to comply with the law. Facility would hire more employees to reduce the overtime hours to comply with the law		
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### 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. The facility had anti-discrimination policy and procedure;
- 2. The regular trainings on anti-discrimination were provided to the employees;
- 3. As informed by interviewed employees, most of employees spoke highly of the facility owner.
- 4. No employee was required to do the examination of the hepatitis B virus and HIV.
- 5. No female employee was required to do the examination of pregnant test.
- 6. There was no evidence of sexual harassment.
- 7. 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 or workers' organisation membership or political affiliation was found in the facility.
- 8. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.

#### **Evidence examined:**

- 1. The regular training records on anti-discrimination;
- 2. The hiring and termination procedure, leave application records and employee handbook.
- 3. Payrolls
- 4. Attendance records
- 5. Termination records
- 6. Management interview and employee interview

Any other comments:	
Nil	

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 60.09	<b>%</b>	Female: 40.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
Is there any evidence of discrimination based on race, caste, national origin,	☐ Hiring	☐ Compensation	<ul><li>☐ Access to training</li></ul>
religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Promotion	☐ Termination or retirement	<ul><li>No evidence of discrimination found</li></ul>
Please give details	Not applicable, there was no any discrimination about hiring, compensation, access to training, promotion, termination or retirement case found.		
Professional Development			
What type of training and development are available for workers?	On-going training is available to enable workers to progress. The equal and fair selection criteria is in place for all promotions and benefits.		

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Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes □ No

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#### 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. The facility signed labour contracts with all employees and the terms and conditions stated in the contracts complied with local laws. All employees received copies of the contracts of employment. 2. All employees were recruited by the facility directly. No labor agency was used to hire employees. No temporary employee, apprenticeship schemes or home employee was identified by the auditor.
- No subcontractor, no home-working existed in the facility. 4. The workers had a copy of the contract in their own language.

# **Evidence examined:**

- 1.The hiring and termination procedure
- 2.Personal files including a copy of employee's contract
- 3. Payroll records were provided for review
- 4. Management interview and employee interview

Any other of	comments:
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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?	<ul><li>☑ Terms &amp; Conditions presented</li><li>☑ Same as actual conditions</li></ul>	☑ Understood by workers
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)	□ Yes ☑ No	
Migrant Workers		

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Type of work undertaken by migrant workers:	All types of work in the facility include migrant workers.	
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)	☐ Yes ☑ No	
confirmed in writing by the worker and is	Please give details:	
evidence of the transaction supplied by the facility to the worker?	Not applicable, there was no such kind of deduction from the workers' wages.	
Is there any observation on this finding?	None	
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<ul><li>✓ Yes □ No</li><li>10 management staffs came from the migrant worker.</li></ul>	
	Non-employee workers	
Recruitment Fees		
Are there any fees?	☐ Yes ☑ 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	Not applicable, there was no agency worker in the facility.	
Were agency workers' age / pay / hours included within the scope of this audit?	□ Yes ☑ No	
Were sufficient documents for agency workers available for review?	□ Yes ☑ No	
Is there a legal contract agreement with	☐ Yes ☑ No	
all agencies?	Please give details:	
	Not applicable, there was no agency worker in the facility.	
Does the site have a system for checking labour standards of agencies?	□ Yes ☑ No	
j	Please give details:	
	Not applicable, there was no agency worker in the facility.	
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?	☐ Yes ☑ No	
	Please give details:	
	There was no contractor in the facility.	
Do all contractor workers understand	☐ Yes ☑ No	
their terms of employment?	Please give details:	
	There was no contractor in the facility.	
	inc. c mas no contractor in the facility.	

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# 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:**

- 1. The facility had established a policy to ensure sub-contracting would not be used unless previously agreed with the main clients.
- 2. All processes were finished within the facility.
- 3.No sub-contracting was used by this facility.
- 4.No home-working was used by this facility.

#### **Evidence examined:**

Any other comments:

Nil

1.Policy on sub-contracting.

Is homeworking used at this site?

- 2. Reviewing of the production records such as materials receiving and issuing records.
- 3. Facility tour (calculation on total production and estimated capacity).

Summary of sub–contracting – if applicable		
Summary of homeworking – if applicable		

✓ No

☐ Yes

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#### 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 facility established anti-harsh or anti-inhumane treatment policy. The policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- 2. The facility established a disciplinary procedure for employees' misbehaviour which included oral warning, written warning and finally termination.
- 3. The anti-harsh or anti-inhumane treatment policy and disciplinary procedure were communicated to the employees through regular trainings.
- 4. Employee interview confirmed that employees were aware of anti-harsh or anti-inhumane treatment policy and disciplinary procedure.
- 5. There is an internal process for grievance, where employees can report any grievances (harassment, bullying, discrimination etc.) and any received complaint will be handled by management. The grievance mechanisms were legitimate, accessible and equitable.

#### **Evidence examined:**

- 1. Anti-harsh or anti-inhumane treatment policy and disciplinary procedure
- 2. Training records regarding anti-harsh or anti-inhumane treatment policy and disciplinary procedure

3. Internal grievance procedure

4. Facility tour

5. Management interview and employee interview		
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?	☑ Yes □ No	
	Please give details:	
	The facility provided a grievanc (such as worker representatives any violations of Labour standa grievances. And the reporter woreporters.	s and suggestion box) to report rds and H&S or any other
If yes, are workers aware of these channels and have access? Please give details.	Through onsite interview, all interview that they were clear about the o	terviewed employees stated channels.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Suggestion box and verbal exch	nanges.
Which of the following groups is there a grievance mechanism in place for?	☑ Worker	Communities
	✓ Suppliers	□ Other

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Please provide grievance mechanism details	The grievance mechanism included a provision for non- retaliation and it allowed workers to report issues anonymously.
Are there any open disputes?	☐ Yes ☑ 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)	☑ Yes □ No Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes ☐ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

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#### 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. All workers in the facility were Chinese. 73 employees (14.8%) were local employees from Guangdong Province, 420 employees (85.2%) were domestic migrant workers from Anhui, Hunan, Henan, Hubei, Guangxi, Fujian, Sichuan, Guizhou, Hainan, Yunnan, Chongqing, Ningxia and Jiangxi province of China. The local workers and migrant workers were hired legally and treated equally in the facility.

2. All workers had the proper legal rights to work in this region. The youngest worker was 19 years old.3. No foreign worker was used by the facility.

#### **Evidence examined:**

1. Hiring procedure

2. Personnel files with labour contracts and ID copies

3. Employing handbook

4. Facility tour

5. Management interview and worker interview

# Any other comments:

Nil

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#### 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

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 facility had written environmental policy.

2. The facility conducted regular environment protection trainings for all employees.

3. The facility provided the environmental document for review.

4. Ms. Huaying Xiong/HR Supervisor was the appointed to responsible for coordinating the facility's efforts

to improve environmental performance. The written appointment paper was provided for reviewing. 5. Through viewing the local government websites and interviews with factory management, it was confirmed that the facility had not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

6. The facility made continuous improvements in their environmental performance. E.g. saving the energy and reducing the consumption of water and electricity, etc.

#### **Evidence examined:**

1.The environmental policy

- 2. Training records on environmental protection
- 3. Energy bills
- 4. Water bill
- Facility tour
- 6. Management interview and employee interviews

#### Any other comments:

Nil

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Environmental Analysis		
Is there a manager responsible for Environmental issues (Name and Position):	Ms. Huaying Xiong/HR supervisor	
Has the site conducted a risk assessment	☑ Yes □ No	
on the environmental impact of the site, including implementation of controls to reduce identified risks?	Please give details:	
reduce identified risks?	Facility had conducted the environmental risk assessment annually, and the relevant record was provided for review.	
Does the site have a recognised environmental system certification such	☐ Yes ☑ No	
as ISO 14000 or equivalent?	Please give details:	
	Facility did not obtain any certification.	
Does the site have an Environmental policy?	☑ Yes □ No	
If yes, is it publicly available?	☑ Yes □ No	
If yes, does it address the key impacts from their operations and their	☑ Yes □ No	
commitment to improvement?	Please give details:	
	The policy had addressed the key impacts from their operations and their commitment to improvement.	
Does the site have a Biodiversity policy?	☑ Yes □ No	
Is there any other sustainability systems present such as Chain of Custody, Forest	☐ Yes ☑ No	
Stewardship Council (FSC), Marine	Please give details:	
Stewardship Council (MSC) etc.?	No such system in the facility.	
Have all legally required permits been shown?	☑ Yes □ No	
3110 WII.	Please give details:	
	The facility provided the legally required document for review.	
Is there a documentation process to record hazardous chemicals used in the	☑ Yes □ No □ Not Applicable	
manufacturing process?	Please give details:	
	The chemicals management procedure was established and related chemical using records were provided for review.	
Is there a system for managing client's	☑ Yes □ No	
requirements and legislation in the destination countries regarding environmental and chemical issues?	Please give details:	
	This is included in the site's internal management system.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes □ No	
	Please give details:	
	The facility has set the targets.	

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Facility has evidence of waste recycling and is monitoring volume of waste that is	☑ Yes □ No	
recycled.	Please give details:	
	The facility had provided the monthly waste recycling and volume monitoring records for review.	
Does the facility have a system in place for accurately measuring and monitoring	☑ Yes □ No	
	Please give details:	
	Relevant policy and data were provided for review.	
Has the facility checked that any Sub- Contracting agencies or business	☐ Yes ☑ No	
partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Please give details:	
	No Sub-Contracting agencies or business partners operating on the facility's premises.	
Usage/Discharge analysis		
Criteria	Previous year: 2023 Current year: 2024	

racility?		
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	506848	124212
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	Local Water authority	Local Water authority
Water Volume Used	10140	2785
Water Discharged	Municipal drainage pipeline	Municipal drainage pipeline
Water Volume Discharged	10140	2785
Water Volume Recycled	0	0
Total waste produced	9296 kgs	2424 kgs
Total hazardous waste produced	402 kgs	80 kgs
Waste to recycling	7867 kgs	1915 kgs
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	11975000 pieces	2442000 pieces

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#### 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 facility had policy and procedures pertaining to anti-bribery, anti-corruption, or unethical Business. 2. The management was appointed to be responsible for implementing standards concerning Business Ethics.
- 3. Through management interview, it was noted that the facility managements were aware of legal and clients' business ethics requirements.
- 4. The facility communicated this business ethics policy to all employees through internal training.
- 5. The facility communicated this business ethics policy to its suppliers through annual meeting. 6.Employees or suppliers could report business ethics issues to the highest-level management through hotline or suggestion box.
- 7. The facility had received and read the Business Ethics policy of the audit company and that facility practices were conducted without any corruption or bribery.

  8. The facility required their suppliers to sign written commitments to ensure the Business Ethics
- regulations to be understood and followed.
- 9.No evidence that the facility had been subjected to any fines/prosecutions for noncompliance to Business Ethics regulations.

#### **Evidence examined:**

- 1. Facility policy and procedures on anti-bribery, anti-corruption, or unethical Business.
- 2.Appointed letter.
- Training records and training material in past year.
- 4.Management interview
- Employee interview
- 6.Suppliers' written commitments
- 7.On site observation

#### Any other comments:

Nil

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Does the facility have a Business Ethics Policy and is the policy communicated	☑ Internal Policy	
and applied internally, externally or both, as appropriate?	Policy for third parties including suppliers	
	Please give details:	
	The Business Ethics Policy was in place, through reviewing training records and employee interview, it was noted that it was communicated to employees and suppliers according to the policy.	
Does the site give training to relevant personnel (e.g. sales and logistics) on	☑ Yes □ No	
business ethics issues?	Please give details:	
	Training records for these topics in 2023 was provided for review.	
Is the policy updated on a regular (as needed) basis?	☑ Yes □ No	
necucu) busis:	Please give details:	
	The policy was reviewed annually and updated if it was necessary.	
Does the site require third parties including suppliers to complete their own business ethics training	☑ Yes □ No	
	Please give details:	
	This requirement was included in supplier management procedure.	

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# **Attachments**



Toilet.JPG



Suggestion box.JPG



Smoke detector.JPG



Silk screen printing.JPG



Sewing.JPG



Raw material warehouse.JPG

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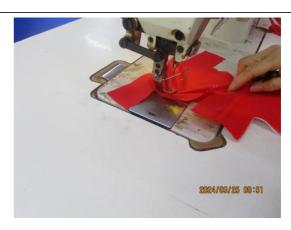
Signed CAPR.pdf



Production building.JPG



PPE Sign.JPG



Needle guard for sewing machine.JPG



Packing.JPG



Paint edge.JPG

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NC-Silk scrren printing employees did not properly wear the provided PPE.JPG



 $\frac{\text{NC-Overtime hours exceeded the legal}}{\text{requirement.pdf}}$ 



Kitchen.JPG



Gluing.JPG



Inspection.JPG



Fire hydrant.JPG

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First aid kit.JPG



Fire alarm.JPG



Fire extinguishers.JPG



**Heatseal.JPG** 



NC-Insufficient social insurance participated.pdf



Finished goods storage.JPG

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Facility name.JPG



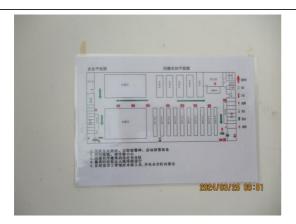
Eye washing station.JPG



**Evacuation direction sign.JPG** 



Facility gate.JPG



**Evacuation plan.JPG** 



Emergency light and exit sign.JPG

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**Emergency assembly point.JPG** 



ETI Code.JPG



**Drinking water.JPG** 



Electric box.JPG



**Cutting.JPG** 



Chemical warehouse.JPG

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Canteen.JPG



Dormitory building.JPG



Bed room.JPG



Attendance recording device.JPG



Auto silk screen printing.JPG





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