




Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC407102429	Sedex Site Reference: (only available on Sedex System)	ZS407133137
Business name (Company name):	Jiafeng Plastic Products Co., Ltd. 深圳市嘉丰达塑胶制品有限公司		
Site name:	Jiafeng Plastic Products Co., Ltd. 深圳市嘉丰达塑胶制品有限公司		
Site address: (Please include full address)	6-1 Tanmian Road, Xikeng Village, Henggang Town, Longgang District, Shenzhen City, Guangdong Province, China 中国广东省深圳市龙岗区 横岗镇西坑村谭面路 6-1 号	Country:	China
Site contact and job title:	Mr. Jack Lam (General manager)		
Site phone:	86-0755-28641869	Site e-mail:	lam@jiafengpvc.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	12-14 August 2020		

Audit Company Name & Logo: 	Report Owner (payer): <i>(If paid for by the customer of the site please remove for Sedex upload)</i> Jiafeng Plastic Products Co., Ltd.
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

Audit Content:

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

Any exceptions to this must be recorded here (e.g. different sample size): none

Auditor Team (s) (please list all including all interviewers):

Lead auditor: Mr. Peter Teng, auditor APSCA number: RA 21700384

Lead auditor APSCA status: RA

Team auditor: none APSCA number: N/A

Interviewers: Mr. Peter Teng, auditor APSCA number: RA 21700384

Report writer: Mr. Peter Teng, auditor APSCA number: RA 21700384

Report reviewer: Olivia Yao

Date of declaration: 14 August 2020

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.

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

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			<input type="checkbox"/>	<input type="checkbox"/>		0	0	OB: none observed GE: none observed
0B	Management systems and code implementation		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
1.	Freely chosen Employment	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
2	Freedom of Association	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
3	Safety and Hygienic Conditions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3	0	0	NC:

									<p>NC 1: Isolated worker did not properly wear PPE (Personal Protective Equipment).</p> <p>NC 2: There was no original qualification certificate of the electrician.</p> <p>NC 3: No adequate secondary containment was available for chemical.</p> <p>OB: none observed</p> <p>GE: none observed</p>
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<p>NC: none observed</p> <p>OB: none observed</p> <p>GE: none observed</p>
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<p>NC: none observed</p> <p>OB: none observed</p> <p>GE: none observed</p>
6	<u>Working Hours</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<p>NC: none observed</p> <p>OB: none observed</p> <p>GE: none observed</p>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	<p>NC: none observed</p> <p>OB: none observed</p> <p>GE: none observed</p>

8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A	N/A	N/A	Not applicable (this was a SMETA 4-Pillar audit)
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed GE: none observed
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	NC: none observed OB: none observed

									GE: none observed
General observations and summary of the site:									
<ol style="list-style-type: none"> The audited facility's products and activities as below: <ul style="list-style-type: none"> Products: cosmetic bags and packing bags Main production processes: Cutting, electrical pressing, sewing and packing processes, etc. Mr. Jack Lam (General manager) was the overall responsible person for establishing, implementing and meeting the relevant requirements and standards. In the audited factory, the information regarding trade union and worker representative as below: <ul style="list-style-type: none"> Trade union: There was no trade union in the facility. Worker representative: The audited factory had a worker committee with 4 worker representatives. The worker representatives conducted meetings quarterly (the latest meeting: 19 June 2020). One worker representative was present at the opening meeting, the audit and the closing meeting. The interviewed worker representative said they were 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; and the facility did not interfere in their activities, and did not discriminate them. The audited facility's youngest worker was 19 years old. The information regarding payroll and attendance records provided and reviewed: <ul style="list-style-type: none"> The payrolls and attendance records after the previous Partial Follow-Up audit (17 September 2019) were available for review; The provided and reviewed payroll records: the payroll records from September 2019 to July 2020 (current month); The provided and reviewed attendance records: the attendance records from 18 September 2019 to 14 August 2020 (the 3rd audit day); The sample size of payrolls records and attendance records for further checking on status of wages and working hours as below: 26 samples from July 2020 (current month); 26 samples from May 2020 (random month); 26 samples from December 2019 (random month). The information regarding worker interviews as below: <ul style="list-style-type: none"> The total number of the interviewed workers: 26 (10 males and 16 females) Individual interviews: 6 workers (3 males and 3 females) Group interviews: 4 groups of 5 including 20 workers (7 males and 13 females) The peak season was not obvious in the past year in the facility. Subcontractor: There was no any sub-contractor and all processes were completed in the facility. No home-working was used by the facility. 									

10. The current Covid-19 measures in the factory: the factory abided by the current local government's regulations with respect to COVID-19. Social distancing was enforced within the factory, and the temperatures of the employees and visitors were taken upon entrance to the factory gate. The travel history of the past 14 days was tracked and verified for all visitors and employees. If the visitors and employees were from COVID-19 high risk areas, they need obtain and provide the COVID-19 nucleic acid test reports with health results before entering the factory. Verification of current physical condition was conducted for all employees and visitors via completion of a questionnaire. Disinfectant was provided at the factory gate and in the toilet rooms, and the employees and visitors can use disinfectant freely.

Additional Auditor Remark:

None

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

Site Details		
A: Company Name:	Jiafeng Plastic Products Co., Ltd. 深圳市嘉丰达塑胶制品有限公司	
B: Site name:	Jiafeng Plastic Products Co., Ltd. 深圳市嘉丰达塑胶制品有限公司	
C: GPS location: (If available)	GPS Address: 6-1 Tanmian Road, Xikeng Village, Henggang Town, Longgang District, Shenzhen City, Guangdong Province, China 中国广东省深圳市龙岗区横岗镇西坑村谭面路 6-1 号	Latitude: N 22°37'20" Longitude: E 114°13'16"
D: 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.: 914403006875687853 Valid date: long term since 14 April 2009	
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	The audited facility's products and activities as below: <ul style="list-style-type: none"> • Products: cosmetic bags and packing bags • Main production processes: Cutting, electrical pressing, sewing and packing processes, etc. 	
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<ol style="list-style-type: none"> The information regarding the establishment date, location, land area and peak season as below: <ul style="list-style-type: none"> • Establishment date: 14 April 2009 • Location: 6-1 Tanmian Road, Xikeng Village, Henggang Town, Longgang District, Shenzhen City, Guangdong Province, China • Total land area occupied: 1500 square meters • Peak season: The peak season was not obvious in the past year in the facility. The information regarding the audited factory's workers as below: <ul style="list-style-type: none"> • Total number of workers: 158 • Female workers: 94; male workers: 64 • Production workers: 132; non-production workers: 26 • Local workers: 67; migrant workers: 91 • Origin of migrant workers: all migrants came from other provinces out of Guangdong province in China, such as Guizhou, Guangxi, Hunan, and Jiangxi provinces, etc. The information regarding the working time and wages as below: <ul style="list-style-type: none"> • The normal working time was 8 hours per day and 5 days per week. • The detailed shift arrangement as below: One shift for all departments: 8:00-12:00 and 13:30-17:30. 	

- The wages were calculated on hourly basis.
 - The workers' wages including normal wages and overtime wages etc. of one month was paid on or before the 12th day of the following month.
4. The factory building included:
- one 3-storey production building
 - one 4-storey dormitory building

Please refer to below table for details:

For below, please add any extra rows if appropriate.

The 3-storey production building	Description	Remark, if any
Floor 1	Cutting department, warehouse and office	Year of establishment: 1998; The total used structure area in this building by the facility: 1462 square meters
Floor 2	Electrical pressing and packing departments	
Floor 3	Electrical pressing, sewing and packing departments; office	
Is this a shared building?	No	Nil

The 4-storey dormitory building	Description	Remark, if any
Floor 1	Kitchen and canteen	Year of establishment: 1998; The total used structure area in this building by the facility: 549 square meters
Floors 2-4	Bedrooms	
Is this a shared building?	No	Nil

F1: Visible structural integrity issues (large cracks) observed?

☐ Yes

☒ No

F2: Please give details: no crack was observed.

F3: Does the site have a structural engineer evaluation?

☒ Yes

☐ No

F4: Please give details: the audited facility had the reports of construction completion acceptance for its buildings.

G: Site function:	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor
H: Month(s) of peak season: (if applicable)	The peak season was not obvious in the past year in the facility.
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	<p>The audited facility's products and activities as below:</p> <ul style="list-style-type: none"> • Products: cosmetic bags and packing bags • Main production processes: Cutting, electrical pressing, sewing and packing processes, etc. <p>The production capacity: 8,000,000 pieces per year</p> <p>Number of production line: 2 production lines</p> <p>The main equipment: 2 cutting machines, 25 electrical pressing machines, 24 sewing machines, 1 needle detector, etc.</p> <p>Subcontractor: There was no any sub-contractor and all processes were completed in the facility.</p>
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None
K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation: 50%
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details

Audit Parameters			
A: Time in and time out	A1: Day 1 Time in: 08:50 A2: Day 1 Time out: 17:00	A3: Day 2 Time in: 08:50 A4: Day 2 Time out: 17:00	A5: Day 3 Time in: 08:30 A6: Day 3 Time out: 12:40
B: Number of auditor days used:	2.5 (1 auditor on 2.5 days)		
C: Audit type:	<input type="checkbox"/> Full Initial <input checked="" type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define		
D: Was the audit announced?	<input checked="" type="checkbox"/> Announced <input type="checkbox"/> Semi – announced: Window detail: weeks <input type="checkbox"/> Unannounced		
E: Was the Sedex SAQ available for review?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: If No, why not?		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes , please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR (Name and job title)	Mr. Jack Lam (General manager)		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
I: Previous audit date:	17 September 2019		
J: Previous audit type:	Partial Follow-Up		
K: Were any previous audits reviewed for this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives

A: Present at the opening meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable (one worker representative was present at the opening meeting, the audit and the closing meeting)		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no trade union in the factory.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	29	0	0	35	0	0	0	64
Worker numbers – female	38	0	0	56	0	0	0	94
Total	67	0	0	91	0	0	0	158
Number of Workers interviewed – male	4	0	0	6	0	0	0	10
Number of Workers interviewed – female	7	0	0	9	0	0	0	16
Total – interviewed sample size	11	0	0	15	0	0	0	26



A: Nationality of Management	China	
<p>B: Please list the nationalities of all workers, with the three most common nationalities listed first.</p> <p><i>Please add more nationalities as applicable to site. Add more rows if required.</i></p>	<p>Nationalities:</p> <p>B1: Nationality 1: <u>China</u></p> <p>B2: Nationality 2: <u>N/A</u></p> <p>B3: Nationality 3: <u>N/A</u></p>	<p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p> <p>Remark:</p> <p>Not applicable. The peak season was not obvious in the past year in the facility.</p>
C: Please provide more information for the three most common nationalities.	<p>C: approx % total workforce: Nationality 1 <u>100%</u></p> <p>C1: approx % total workforce: Nationality 2 <u>N/A</u></p> <p>C2: approx % total workforce: Nationality 3 <u>N/A</u></p>	
D: Worker remuneration (management information)	<p>D: <u>0</u>% workers on piece rate</p> <p>D1: <u>100</u>% hourly paid workers</p> <p>D2: <u>0</u>% salaried workers</p> <p>Payment cycle:</p> <p>D3: <u>0</u>% daily paid</p> <p>D4: <u>0</u>% weekly paid</p> <p>D5: <u>100</u>% monthly paid</p> <p>D6: <u>0</u>% other</p> <p>D7: If other, please give details: N/A</p>	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	Group interviews: 4 groups of 5 including 20 workers (7 males and 13 females)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 3	D2: Female: 3
E: 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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	There was no complaint from the interviewed workers.	
I: What did the workers like the most about working at this site?	Working environment was comfortable and wages were good.	
J: Any additional comment(s) regarding interviews:	The interviewed workers said they enjoyed working in this facility.	
K: Attitude of workers to hours worked:	The workers said their working hours were acceptable.	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: Not applicable (only normal worker interview was conducted)		

M: Attitude of workers:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

The information regarding worker interviews as below:

- The total number of the interviewed workers: 26 (10 males and 16 females)
- Individual interviews: 6 workers (3 males and 3 females)
- Group interviews: 4 groups of 5 including 20 workers (7 males and 13 females)

During this audit, the interviewed workers were selected by auditor through document review and onsite tour. The workers were assured of confidentiality and they spoke freely of their views of the facility. All interviewees said they were satisfied with their employment and the provided wages which in their views were in line with legal wages in the locality; they felt free to leave their employer and understood the notice period required; they had good relationships with their supervisors and managers who treated them with respect; the workers could raise their suggestions, concerns or appeals through EHS committee representatives, telephone, suggestion box, and their team leaders or above, who would take it to the management; and sometimes, they had seen the facility had took some corrective actions accordingly.

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

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

In the audited factory, the information regarding trade union and worker representative as below:

- Trade union: There was no trade union in the facility.
- Worker representative: The audited factory had a worker committee with 4 worker representatives. The worker representatives conducted meetings quarterly (the latest meeting: 19 June 2020). One worker representative was present at the opening meeting, the audit and the closing meeting.
- The interviewed worker representative said that they were 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; and the facility did not interfere in their activities, and did not discriminate them.

O: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

During this audit, the factory management was open and cooperative throughout the process of the audit. The factory designated several management staff to be responsible for this audit, e.g. the factory 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 documents were provided in a timely manner. All necessary areas were allowed access for tour. A private room was arranged for workers' interview and the management allowed auditor to select workers for interviews. Photos taking of the facilities and copies' keeping of the samples of the reviewed documents were also permitted by the factory management. In the closing meeting, the management agreed with the found non-compliance and stated that they would take relevant corrective and preventive actions for the found non-compliance as soon as possible. The management did not raise any negative feedback for the audit.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

0.A. Guidance for Observations

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 factory had the Human Rights Policy covering human rights impacts and issues and expressing commitment to respect human rights. The Human Rights Policy was endorsed by general manager.
2. The factory had communicated Human Rights Policy to all appropriate parties including its own suppliers through regular trainings or 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.
3. The factory had one designated person responsible for implementing standards concerning Human Rights and the designation paper was available for review.
4. The factory 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.
5. The factory 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.
6. Worker interviews, management interviews and the facility's regular assessment and measurement of its direct, indirect and potential human rights impacts on its stakeholders showed that the facility had no adverse impact of human rights on its stakeholders.
7. The factory had the policy and procedure for safeguarding workers' confidential and private data and information. Workers' confidential and private data and information were kept in lockers of the office by the responsible persons (i.e. financial and HR staff). And the workers' confidential and private information and data in computers were also controlled and accessed only to authorised persons (i.e. financial and HR staff).

8. The factory had established a transparent system for confidentially reporting and dealing with human rights impacts without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report human rights relevant complaints without fear of reprisal and such kind of information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e. Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the facility. Worker interviews confirmed that they were aware of this system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. The written Human Rights Policy; the training records about 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 policy and procedure for safeguarding workers' confidential and private data and information
6. The worker interviews and management interviews
7. The posters and trainings records about Human Rights Policy.
8. Onsite observation

Any other comments:

Nil

A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: The factory had the Human Rights Policy covering human rights impacts and issues and expressing commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name and Job title: Mr. Jack Lam (General manager)
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory had established a transparent system for confidentially reporting and dealing with human rights impacts without fear of

	<p>reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report human rights relevant complaints without fear of reprisal and such kind of information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review.</p>
<p>D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details</p> <p>Remark: The factory had established a transparent system for confidentially reporting and dealing with human rights impacts without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report human rights relevant complaints without fear of reprisal and such kind of information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e. Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the facility. Worker interviews confirmed that they were aware of this system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter.</p>
<p>E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>E1: Please give details: The factory had the policy and procedure for safeguarding workers' confidential and private data and information. Workers' confidential and private data and information were kept in lockers of the office by the responsible persons (i.e. financial and HR staff). And</p>

	the workers' confidential and private information and data in computers were also controlled and accessed only to authorised persons (i.e. financial and HR staff).
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Findings		
Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: None observed Local law or ETI/Additional elements / customer specific requirement: Not applicable Comments: Not applicable		Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: __5__ %	A2: This year __5__ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: __5__ %	C2: This year __6__ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1%	
E: Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please describe: According to the accident reports and worker interviews, no accident occurred in the factory.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F2: This year: Number: 0
G: 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	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months __0__% workers	I2: 12 months __0__% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months ___0___% workers	J2: 12 months ___0___% workers
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0B: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 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.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.4 Suppliers are expected to communicate this Code to all employees.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current systems:

1. The factory had the systems for delivering compliance to this Code. A CSR manual was 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. There was the designated and overall responsible senior person for establishing, implementing and meeting the relevant Code, requirements and standards. The appointment paper was available for review. The factory had a team responsible for establishing, implementing and meeting the relevant Code, requirements, standards as well as the internal audit including risk assessment of the social standards. If any non-compliance or risk was found, this team would take the corrective and preventive actions accordingly. The team members included managers, HR staff, financial staff, Health and Safety Officer, etc. The team conducted the internal audit once per year.
3. The facility obtained the internationally recognized system certificate: ISO9001:2015 certificate (certificate no.: 03419Q51452R0M; valid period: from 5 December 2019 to 4 December 2022).
4. The factory had provided the valid land using permit and the property ownership certificate of the facility building for reviewing. The facility was operating legally and had the correct & valid business license.
5. The facility communicated the code to all workers 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 – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. The CSR manual; Client's code of conduct at the facility (posted in Chinese in the workplaces); Appointment papers for compliance responsible persons; Internal audit documents (e.g. annual audit reports) from the internal audit team; the internationally recognized system certificate.
2. Business license; the land using permit and the property ownership certificate of facility building.
3. The appointment paper for the senior management responsible for compliance with the Code
4. Training records for workers

5. Written social compliance commitments from Suppliers and social compliance assessment reports for its suppliers
6. Management interview and worker interview

Any other comments:
Nil

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: Please give details: Auditor checked this through internet, and no fine or prosecution was found for the factory.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The factory had the policies and procedures for forced labour, child labour, discrimination, harassment and abuse, and the factory had provided relevant trainings for workers.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	Yes. The factory had the policies and procedures for forced labour, child labour, discrimination, harassment and abuse, and the factory had provided relevant trainings for workers. No non-compliance regarding forced labour, child labour, discrimination, harassment or abuse was found. There were both female and male among managers and supervisors.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The factory provided regular trainings about the standards of forced labour, child labour, discrimination, harassment and abuse for both management and workers, which was confirmed by the provided training records and interviews with both management and workers.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Yes. Regular training records were provided for review. The workers were aware clearly of the factory's policies and procedures about forced labour, child labour, discrimination, harassment and abuse according to the interviews.

<p>F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: The facility obtained the internationally recognized system certificate: ISO9001:2015 certificate (certificate no.: 03419Q51452R0M; valid period: from 5 December 2019 to 4 December 2022).</p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: The factory had Human Resources department which in charge of the recruitment of workers, assignment of workers' post, calculating the workers' working hours every month, etc.</p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: There was the designated and overall responsible senior person for establishing, implementing and meeting the relevant Code, requirements and standards. The appointment paper was available for review</p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: The factory established and implemented the policy and procedure for safeguarding workers' confidential and private data and information.</p>
<p>J: Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The factory established and implemented the policy and procedure for safeguarding workers' confidential and private data and information. Workers' confidential and private data and information were kept in lockers of the office by the responsible persons (i.e. financial and HR staff). And the workers' confidential and private information and data in computers were also controlled and accessed only to authorised persons (i.e. financial and HR staff).</p>
<p>K: Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessment was conducted regularly by the factory to evaluate the effectiveness of the policy and procedure for safeguarding workers' confidential and private data and information.</p>

<p>L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1 Please give details: The factory had a team responsible for establishing, implementing and meeting the relevant Code, requirements, standards as well as the internal audit including risk assessment of the social standards. If any non-compliance or risk was found, this team would take the corrective and preventive actions accordingly.</p>
<p>M: Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The factory had its supplier selecting policy and procedure to ensure all suppliers met the labour standards and this code. The factory communicated the code to their suppliers through providing copy of CSR manual and asking suppliers to sign the written social compliance commitments; and the factory also conducted social compliance assessments for its suppliers regularly.</p>
<p style="text-align: center;">Land rights</p>	
<p>N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The factory had the valid land using permit and the property ownership certificate of the facility building.</p>
<p>O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No O1: Please give details: The factory had conducted due diligence about the national laws and practices relating to land title through visiting government's website, consulting the government officials and verifying the legal documents of the land. The HR manager was appointed to be responsible for updating the applicable law lists and conducting internal audit for this point.</p>
<p>P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: If yes, how does the company obtain FPIC: The factory had the written policy and procedure specific to the land rights. The factory had conducted due diligence to obtain free, prior and informed consent through visiting government's website, consulting the government officials and verifying the legal documents of the land. The HR manager was appointed to be responsible for updating the</p>

	applicable law lists and conducting internal audit for this point.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: The land was bought from the local government before constructing the facility building and the land transferring fee receipts were available for review. The factory had the valid land using permit and the property ownership certificate of the facility building.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: not applicable (the factory did not have plan of land acquisition)
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No S1: Please give details: No such evidence was found in the audit. There was no illegal appropriation of land for the facility building or expansion of footprint.

Non-compliance:	
<p>1. Description of non-compliance:</p> <p><input type="checkbox"/> NC against ETI/Additional Elements</p> <p><input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p>Local law and/or ETI requirement:</p> <p>Not applicable</p> <p>Recommended corrective action:</p> <p>Not applicable</p>	<p>Objective evidence observed:</p> <p><i>(where relevant please add photo numbers)</i></p> <p>Not applicable</p>

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments:	Objective evidence observed: Not applicable

Not applicable

Good Examples observed:

Description of Good Example (GE):
None observed

**Objective evidence
observed:**
Not applicable

1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

ETI

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 factory had a written policy of prohibiting forced, bonded and prison labour. The policy stated that the factory did not require deposit or withhold workers' ID cards; the factory did not limit the workers' freedom; the factory prohibited forced, bonded or involuntary prison labour; and workers were free to leave their employer after reasonable notice, etc.
2. The factory had a written recruitment procedure which stated that the workers must present their ID cards for proof of age but only copies would be kept in the personnel files and the original ID cards would be given back to the workers.
3. The factory had the employing handbook which was given to each worker on joining. The employing handbook stated that workers were free to leave with 3 days' prior written notice within their probation period and can resign with one month's prior written notice after the probation period; according to the onsite observation and worker interviews, the workers were free to leave the workplace after their working hours every day; the overtime was voluntary, etc.
4. The factory had the rules for security guards stating that the responsibilities of security guards were only protecting the safety of the factory's personnel and properties, and security guards were not allowed to abuse workers and conduct body search.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. Policy of prohibiting forced, bonded and prison labour
2. Recruitment procedure
3. Employing handbook
4. Personnel files and labour contracts
5. Resignation records
6. Rules for security guards
7. Onsite observation, management and worker interview

Any other comments:

Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's

- ☐ Yes
☒ No

A1: If yes, please give details and category of workers affected:

B: Is there any evidence of a loan scheme in operation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: Not applicable (there was no any restriction on workers' freedom to terminate employment. Workers were free to leave with 3 days' prior written notice within their probation period and can resign with one month's prior written notice after the probation period)
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable E1: Please describe finding: Not applicable (the factory was not UK based or registered or turnover was less than 36m+, so modern day slavery statement was not required for the audited factory)
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please describe finding: not applicable (there was no any restriction on workers' freedoms to leave the site at the end of the work day. According to the onsite observation and worker interviews, the workers were free to leave the workplace after their working hours every day)
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: Not applicable (there was no risk of forced / trafficked / bonded labour in its supply chain)
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: Not applicable (there was no risk of forced / trafficked / bonded labour in its supply chain)

Non-compliance:

1. Description of non-compliance:
☐ NC against ETI ☐ NC against Local Law: ☐ NC against customer code:

None observed

Local law and/or ETI requirement

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:
(where relevant please add photo numbers)

Not applicable

Observation:
Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:
Description of Good Example (GE):

None observed

Objective evidence observed:

Not applicable

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

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

- 2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

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

Current systems:

- The factory 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.
- The factory 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, who would take it to the management.
- In the audited factory, the information regarding trade union and worker representative as below:
 - Trade union: There was no trade union in the facility.
 - Worker representative: The audited factory had a worker committee with 4 worker representatives. The worker representatives conducted meetings quarterly (the latest meeting: 19 June 2020). One worker representative was present at the opening meeting, the audit and the closing meeting.
 - The interviewed worker representative said that they were 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; and the facility did not interfere in their activities, and did not discriminate them.
- The interviewed workers confirmed that they were free to join trade union or workers' organisation and enjoyed the right to collective bargaining.
- The response records for workers' suggestions and appeals were available for review.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Policy of freedom of association and right to collective bargaining
- Policy about suggestions and appeals
- The selection records and meeting records for worker representatives
- Response records for workers' suggestions and appeals
- Interviews with management, workers, and worker representatives

Any other comments:

Nil

A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Through EHS committee representatives, telephone, suggestion box, and their team leaders or above, etc. D2: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The audited factory provided the meeting room for the regular meetings of the worker representatives.	
F: Name of union and union representative, if applicable:	N/A (There was no trade union in the facility).	F1: Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes. The audited factory had a worker committee with 4 worker representatives.	G1: Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Per worker interviews, their representatives were selected by them, so they knew their representatives clearly.
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	I1: Date of last election: 20 March 2019
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The interviewed workers confirmed that they could raise all kinds of topics such as topics about their working environment, working time, wages and benefit, environmental issues, employment practices, etc. to their representatives.	

K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes , please state how many: One worker representative was interviewed in the audit.	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	Yes. The audited factory had a worker committee with 4 worker representatives. The worker representatives conducted meetings quarterly (the latest meeting: 19 June 2020). It took 2 hours to discuss the environmental, health and safety issues, wages, etc. in the latest meeting. The meeting minutes were posted on the notice boards.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable (there was no collective bargaining agreement)	
If Yes , what percentage by trade Union/worker representation	M1: ____% workers covered by Union CBA Not applicable (there was no collective bargaining agreement)	M2: ____% workers covered by worker rep CBA Not applicable (there was no collective bargaining agreement)
M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable (there was no collective bargaining agreement)	

Non-compliance:	
1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable

3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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.
- There was the appointed person for the facility's health and safety issues and the appointment paper was available for review.
- 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 in the facility.
- Sufficient clean toilets segregated by gender were available to all workers.
- Ventilation, temperature and lighting were adequate for all facility areas.
- Accident reports were available for review.
- The factory provided the evaluation report of occupational hazardous factors for review.
- Occupational health examination reports for the employees exposed to the occupational hazard factors were valid and provided for review.
- There was the qualification certificate of safety production knowledge and management skill for the principal in charge in the facility.
- There was the qualification certificate of safety production knowledge and management skill for the person for the management of work safety in the facility.
- Non-compliance 1: Isolated worker did not properly wear PPE (Personal Protective Equipment). During facility tour, auditor found that 2 out of 4 cleanser using workers in the packing workshop on the 3F of the production building wore the cotton gloves instead of the rubber gloves, and did not wear the active carbon masks in work (remark: the factory had provided the rubber gloves and the active carbon masks to the cleanser using workers).

2. Fire Safety

- Valid fire safety certificate was available for the facility building.
- There were 2 safety exits for each facility floor.
- The factory's fire prevention related facilities included (1) fire extinguishers; (2) fire hydrants; (3) emergency lights; (4) safety exit signs; (5) fire alarms; (6) evacuation plans; (7) emergency assembly point sign; (8) "No smoking" signs, etc.

- Fire prevention related facilities were inspected monthly, and the regular inspection records were available for review.
- The safety exit doors were adequate in terms of door type and opening direction.
- Evacuation routes were designed well with yellow lines and unblocked.
- Evacuation plans were posted at each safety exit and understood by all interviewed workers.
- Fire drills were organised and recorded every 6 months in both production areas and dormitory areas. All workers attended the facility's regular fire drills including fire-fighting drills and evacuation drills.
- Non-compliance: none.

3. Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Warning signs were posted on the electrical panels.
- Non-compliance 1: There was no original qualification certificate of the electrician. During document review, auditor found that the facility only provided the copy of the qualification certificate of the electrician, but cannot provide the original qualification certificate of the electrician for review.

4. Medical services

- There were first aid kits with adequate first aid supplies in the facility and they were well stocked.
- There were adequate trained first aiders in the factory.
- Non-compliance: none.

5. Machine Safety

- The regular inspection and maintenance records of the machines were available for review.
- The dangerous parts of the machines were installed with protective devices.
- There was no special appliance in the facility.
- Non-compliance: none.

6. Chemical safety

- Eye-wash stations were available at the places where chemicals were used and stored.
- Workers exposed to chemicals confirmed that they had been trained on chemical safety.
- The hazardous chemical emergency response drill was conducted once per year. The drill records were available for review.
- There was the MSDS for chemical.
- The safety label was available for chemical.
- Non-compliance 1: No adequate secondary containment was available for chemical. During facility tour, auditor found that 1 barrel of cleanser (with total volume of around 40 L) was used in the packing workshop on the 3F of the production building, but there was no secondary containment for it.

7. Kitchen and canteen hygiene conditions

- Catering service permit of the canteen/kitchen was up-to-date.
- Health certificates of cooks were valid.
- Refrigerator was available in the kitchen to store food.
- The kitchen and canteen area were clean, tidy and hygienic.
- Non-compliance: none.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. General Health and Safety management

- Health and safety policy
- Health and safety manual
- Appointment document for the Health and Safety Supervisor
- Health and safety committee minutes

- Toilet cleaning records
- Temperature recording sheets
- Accident reports
- The evaluation report of occupational hazardous factors (latest testing date: 24 June 2020)
- Occupational health examination reports
- The qualification certificate of safety production knowledge and management skill for the principal in charge in the facility (valid till 10 September 2022)
- The qualification certificate of safety production knowledge and management skill for the person for the management of work safety in the facility (valid till 10 September 2022)
- PPE issuing and receiving records

2. Fire Safety

- Fire certificates (issued in 2004)
- Fire prevention facilities' regular maintenance and inspection records
- Fire drill records (latest fire drill date: 18 March 2020)

3. Electrical safety

- Electrical equipment maintenance and inspection records

4. Medical services

- Trained first aiders' certificates (latest training date: 22 October 2019)

5. Machine Safety

- The regular inspection and maintenance records of the machines

6. Chemical safety

- Eye-wash stations' inspection records
- Chemical safety training records
- Chemical list for each chemical
- Chemical emergency response plan and drill records (latest drill date: 19 June 2020)

7. Kitchen and canteen hygiene conditions

- Catering service permit of the canteen/kitchen (valid till 9 January 2023)
- Health certificates of cooks (valid till 23 April 2021)

8. Other evidence

- Onsite observation
- Interviews with Health and Safety Officer
- Interviews with workers and H&S committee members

Any other comments:

Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?

- ☒ Yes
☐ No

A1: Please give details: The factory had established and implemented the valid Health and Safety policies and procedures covering the occupational health and safety section, and provided the pre-work and regular trainings about the Health and Safety policies and procedures to all workers, which was confirmed by the provided training records and worker interviews.

<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The factory had established and implemented the valid Health and Safety policies and procedures covering the occupational health and safety section, which was included in the workers' manual.</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: There was no structural addition (e.g. floor added) for the facility building.</p>
<p>D: Are visitors to the site informed on H&S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: All visitors to the factory were informed on the factory's health and safety policy and procedure, and provided with adequate personal protective equipment.</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please give details: no medical room or medical facility was provided for the workers and there was no such legal requirement for the factory.</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: Please give details: 1. There was no doctor or nurse in the factory; and doctor and nurse were also not required legally for the factory. 2. There were adequate trained first aiders in the factory. The first aiders were trained in the local hospital. 3. There were first aid kits with adequate first aid supplies in the facility and they were well stocked. 4. The workers were easy to access to first aid kits and first aiders.</p>
<p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: not applicable (the factory did not provide transportation to the workers. The workers did not need transportation service per worker interviews and management interviews)</p>
<p>H: Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The adequate secure lockers were provided for the workers in the dormitory.</p>
<p>I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: the health and safety risk assessment including evaluating the arrangements for workers doing overtime were conducted regularly. Controlling actions were taken to reduce identified risks, such as adequate lunch break and supper break were provided for all workers; internal trainings were conducted for machine operators, posters on good Health and Safety practices were posted in workplaces;</p>

	warning signs were posted at the places such as electrical panels, machine using places and PPE usage workstations, etc.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The audited factory met its legal obligations on environmental requirements and provided the Environment Impact Assessment Report, and Environment Impact Assessment Approval for review. No noncompliance about environment was found in the audit.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The audited factory met its customer requirements on environmental standards including not using of banned chemicals. The factory had a team who studied and collected the latest environmental and chemical requirements (e.g. banned chemical list) from the authorities both the end clients located countries and the facility located country (i.e. China) and from the end clients regularly through communicating with end clients or internet, then provided the trainings to both management staff and non-management workers and implemented the updated & strictest environmental and chemical standards in the facility. The facility had the internal audit team and the internal audit team conducted regular internal inspections and audits against the updated & strictest environmental and chemical requirements and standards, if any violation about environment or chemical was found, the internal audit team would analyse the root cause, take corrective and preventive actions accordingly.

Non-compliance:

1. Description of non-compliance:

☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code:

Isolated worker did not properly wear PPE (Personal Protective Equipment). During facility tour, auditor found that 2 out of 4 cleanser using workers in the packing workshop on the 3F of the production building wore the cotton gloves instead of the rubber gloves, and did not wear the active carbon masks in work (remark: the factory had provided the rubber gloves and the active carbon masks to the cleanser using workers).

Local law and/or ETI requirement

Local law:

In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.

ETI requirement:

Objective evidence observed:

(where relevant please add photo numbers)

Onsite observation (please refer to the NC photo 1)

<p>ETI 3.2: Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Recommended corrective action: It is recommended that the factory should supervise and train all cleanser using workers to wear the provided PPE (Personal Protective Equipment) in work.</p>	
<p>2. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: There was no original qualification certificate of the electrician. During document review, auditor found that the facility only provided the copy of the qualification certificate of the electrician, but cannot provide the original qualification certificate of the electrician for review.</p> <p>Local law and/or ETI requirement Local law: In accordance with the PRC Labor Law article 55, laborers engaged in special tasks must receive specialized training and acquire a license for such tasks. ETI requirement: ETI 3.2: Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>Recommended corrective action: It is recommended that the factory should keep and provide the original qualification certificate of the electrician for review.</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i> Document review (i.e. reviewing of qualification certificate of the electrician)</p>
<p>3. Description of non-compliance: <input checked="" type="checkbox"/> NC against ETI <input checked="" type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: No adequate secondary containment was available for chemical. During facility tour, auditor found that 1 barrel of cleanser (with total volume of around 40 L) was used in the packing workshop on the 3F of the production building, but there was no secondary containment for it.</p> <p>Local law and/or ETI requirement Local law: In accordance with Regulations on the Safety Management of Dangerous Chemicals article 20, The units producing, storing dangerous chemicals shall, according to the categories and hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipments for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, fire fighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moistureproof, protection against thunder, protection against static, antisepsis, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipments. ETI requirement: ETI 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</p>	<p>Objective evidence observed: <i>(where relevant please add photo numbers)</i> Onsite observation (please refer to the NC photo 2)</p>

as is reasonably practicable, the causes of hazards inherent in the working environment.

Recommended corrective action:

It is recommended that the factory should install adequate secondary containment for the barrel of cleanser in the packing workshop on the 3F of the production building.

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

4: Child Labour Shall Not Be Used

[\(Click here to return to summary of findings\)](#)

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ETI

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 stated that workers must present their ID cards for proof of age but only copies would be kept in the personnel files and the original ID cards would be given back to the workers; and the factory would never employ and use any child labour under the age of 16 years old.

2. There was a written juvenile worker and pregnant worker protection procedure although there was no juvenile worker or pregnant worker in the factory.

3. There was a written child labour remediation procedure although there was no child labour in the factory.

4. There was the written worker roster in the facility.

5. There were the personnel files included recruitment date, a bio-data sheet, a recent photo and the age documentation (i.e. copy of the ID card) for all workers. The ID card copy listed the worker's name, household address and the date of birth.

6. The audited facility's youngest worker was 19 years old.

7. Management interview and worker interviews showed that the factory 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 factory would not recruit the applicant under the age of 16 years old.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

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

A: Legal age of employment:

16 years old

B: Age of youngest worker found:	The audited facility's youngest worker was 19 years old.
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	Not applicable (there was no worker under 18 years old)
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: If yes, give details Not applicable (there was no worker under 18 years old)

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Not applicable
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Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable
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Good Examples observed:

Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable
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5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key information\)](#)

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

1. The facility had established and implemented the wage & benefit policy and controlling procedure, which were communicated to the workers through regular trainings.
2. No monetary fine was used as disciplinary measure.
3. All workers' wages were calculated by hourly rates.
4. All workers were paid in cash.
5. All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment; each worker was given a pay slip and each worker signed for their wages when they were paid.
6. The annual leave, sick leave, marriage leave, funeral leave, stoppage leave, paternity leave and child-bearing leave etc. were provided to relevant workers adequately.
7. The payday:
 - 7.1 For the normal workers: The workers' wages including normal wages and overtime wages etc. of one month was paid on or before the 12th day of the following month.
 - 7.2 For the resigned workers: The resigned workers' wages were paid when the labour relationship was ended.
8. The local minimum wage standard was set at RMB 2200 per month equivalent to RMB 12.64 (2200/21.75/8) per hour since 1 August 2018.
9. The status of social insurance:
 - 9.1 All employees had participated in basic endowment insurance, employment injury insurance, basic medical insurance, unemployment insurance and maternity insurance.
 - 9.2 The social insurance payments were passed on to the relevant authorities in a timely manner.
10. The information regarding payroll and attendance records provided and reviewed:
 - The payrolls and attendance records after the previous Partial Follow-Up audit (17 September 2019) were available for review;
 - The provided and reviewed payroll records: the payroll records from September 2019 to July 2020 (current month);
 - The provided and reviewed attendance records: the attendance records from 18 September 2019 to 14 August 2020 (the 3rd audit day);
 - The sample size of payrolls records and attendance records for further checking on status of wages and working hours as below:
 - 26 samples from July 2020 (current month);
 - 26 samples from May 2020 (random month);

26 samples from December 2019 (random month).

11. The minimum wages and overtime wages:

11.1 The minimum wage paid was RMB 2349-2610 per month equivalent to RMB 13.5 (2349/21.75/8)-15 (2610/21.75/8) per hour in the sampled months.

11.2 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months.

12. No inconsistency regarding the workers' wages and working time was found between the payrolls, the attendance records, the production related records and worker interviews, so the workers' wages and working time were adequate and could be verified.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Wage & benefit policy and controlling procedure; and training records about wage and benefit policy and controlling procedure
- Local and national laws
- Disciplinary records
- Labour contracts for all workers (to examine agreed wage rates)
- Leave records
- Resignation records
- Local legal minimum wage documents
- Social insurance payment receipts from the local authority
- 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.
- Worker interview and management interview.
- The provided payroll and attendance records

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:
None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)
Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Objective evidence observed:

Not applicable

Comments: Not applicable	
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day and 40 hours per week	A1: 8 hours per day and 40 hours per week	A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Remark: there was no Collective Bargaining Agreement.
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 3 hours per day and 36 hours per month	B1: Daily, weekly and monthly overtime hours as below: 0-2 overtime hours per day, 0-10 overtime hours per week and 26-36 overtime hours per month in July 2020 (current month); 0-2 overtime hours per day, 8-12 overtime hours per week and 32-36 overtime hours per month in May 2020 (random month); 0-2 overtime hours per day, 8	B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Remark: there was no Collective Bargaining Agreement.

		overtime hours per week and 32 overtime hours per month in December 2019 (random month).	
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: RMB 2200 per month equivalent to RMB 12.64 (2200/21.75/8) per hour since 1 August 2018.	C1: RMB 2349-2610 per month equivalent to RMB 13.5 (2349/21.75/8)-15 (2610/21.75/8) per hour in the sampled months.	C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Remark: there was no Collective Bargaining Agreement.
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 1) No less than 150% of the normal wages for overtime working on normal weekdays; 2) no less than 200% of the normal wages for overtime working on rest day if no deferred rest can be taken; 3) no less than 300% of the normal wages for overtime working on statutory holidays	D1: 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months.	D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Remark: there was no Collective Bargaining Agreement.

Wages analysis:

[\(Click here to return to Key Information\)](#)

A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
A1: If No , why not?	Not applicable (the accurate records were shown in the audit)

<p>B: 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)</p>	<p>26 samples from July 2020 (current month); 26 samples from May 2020 (random month); 26 samples from December 2019 (random month).</p>		
<p>C: Are there different legal minimum wage grades? If Yes, please specify all.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>C1: If Yes, please give details: Not applicable (there were no different legal minimum wage grades)</p>	
<p>D: If there are different legal minimum grades, are all workers graded and paid correctly?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	<p>D1: If No, please give details: Not applicable (there were no different legal minimum wage grades)</p>	
<p>E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?</p>	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above	<p>E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> RMB 2349 per month equivalent to RMB 13.5 (2349/21.75/8) per hour in the sampled months</p> <p>Remark:</p> <ol style="list-style-type: none"> 1. Legal minimum: RMB 2200 per month equivalent to RMB 12.64 (2200/21.75/8) per hour since 1 August 2018. 2. The minimum wage paid was RMB 2349-2610 per month equivalent to RMB 13.5 (2349/21.75/8)-15 (2610/21.75/8) per hour in the sampled months. 	
<p>F: Please indicate the breakdown of workforce per earnings:</p>	<p>F1: ____% of workforce earning under minimum wage F2: ____% of workforce earning minimum wage F3: __100__% of workforce earning above minimum wage</p>		
<p>G: Bonus Scheme found: Please specify details:</p>	<p>Bonus Scheme found: <i>Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.</i></p> <p>RMB 50 per month for bonus was provided for the workers per payrolls and worker interviews.</p>		
<p>H: What deductions are required by law e.g. social insurance? Please state all types:</p>	<p>1. Social insurance: retirement insurance, medical insurance, and unemployment insurance should be paid by both the workers and the employer (remark: maternity insurance and work-related injury insurance should be paid by the employer only); 2. Personal income tax would be deducted from the wages if the wages exceeded RMB 5000 per month.</p>		
<p>I: Have these deductions been made?</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>I1: Please list all deductions that have been made.</p>	<p>1. Social insurance fee 2. Personal income tax</p> <p>Please describe: social insurance fee and personal income tax had been deducted from the relevant</p>

			workers' wages per legal requirements.
		I2: Please list all deductions that have not been made.	1. None 2. None Please describe: None
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> Repeated occurrence:	
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The attendance records reflected all time worked including the normal working hours and the overtime hours. The meetings were arranged during the time of work shift, the time for meetings was regarded as working time and paid legally.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: Please specify amount/time: not applicable (there was not a defined living wage)		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: Not applicable (there was not a defined living wage)		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: The factory 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.		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

	P1: Please give details: Through factory rules review, payroll records review and worker interviews, it was confirmed that equal rates were being paid for equal work.
Q: How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:

6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

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:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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

Current Systems and Evidence Examined

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

Current systems:

1. The factory had established and implemented the voluntary overtime policy, working time policy and controlling procedure, which were communicated to the workers through regular trainings.
2. The workers' attendances were recorded by fingerprint system.
3. The information regarding payroll and attendance records provided and reviewed:
 - The payrolls and attendance records after the previous Partial Follow-Up audit (17 September 2019) were available for review;
 - The provided and reviewed payroll records: the payroll records from September 2019 to July 2020 (current month);
 - The provided and reviewed attendance records: the attendance records from 18 September 2019 to 14 August 2020 (the 3rd audit day);
 - The sample size of payrolls records and attendance records for further checking on status of wages and working hours as below:
26 samples from July 2020 (current month);
26 samples from May 2020 (random month);

26 samples from December 2019 (random month).

4. Based on the provided attendance records and payrolls:

4.1 The standard normal working hours were 8 hours per day and 40 hours per week;

4.2 At least 1 day off in a week was assured;

4.3 The total weekly working time (i.e. normal working time plus overtime per week) was 40-52 hours;

4.4 Daily, weekly and monthly overtime hours as below:

0-2 overtime hours per day, 0-10 overtime hours per week and 26-36 overtime hours per month in July 2020 (current month);

0-2 overtime hours per day, 8-12 overtime hours per week and 32-36 overtime hours per month in May 2020 (random month);

0-2 overtime hours per day, 8 overtime hours per week and 32 overtime hours per month in December 2019 (random month)

5. No inconsistency regarding the workers' wages and working time was found between the payrolls, the attendance records, the production related records and worker interviews, so the workers' wages and working time were adequate and could be verified.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Voluntary overtime policy, working time policy and controlling procedure; and the training records about voluntary overtime policy, working time policy and controlling procedure
- Labour contracts
- Local and national laws
- 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.
- Sampled pay slips with recorded hours of all workers interviewed
- Worker interview and management interview.
- The provided payroll and attendance records

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:	
Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)							
Systems & Processes							
A. What timekeeping systems are used: time card etc.	Describe: The workers' attendances were recorded by fingerprint system.						
B: Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details Remark: The sample size of attendance was as same as the sample size in wage section (as below): 26 samples from July 2020 (current month); 26 samples from May 2020 (random month); 26 samples from December 2019 (random month).						
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details: Not applicable (standard/contracted working hours were defined in all labour contracts)					
D: Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	D1: If YES, please complete as appropriate: <table border="1"> <tr> <td><input type="checkbox"/> 0 hrs</td> <td><input type="checkbox"/> Part time</td> <td><input type="checkbox"/> Variable hrs</td> <td><input type="checkbox"/> Other</td> </tr> </table> If "Other", Please define:		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other				

		Not applicable (there was no any other type of contracts or employment agreement used)
E: Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<i>E1: If yes, please detail hours, %, types of workers affected and frequency</i> Please give details: Not applicable (the standard/contracted normal working hours were 8 hours per day and 40 hours per week)
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: <input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No If 'No', please explain:	F3: Is this allowed by local law? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Maximum number of days worked without a day off (in sample):	
	Maximum number of days worked without a day off in the attendance samples: 6 days in July 2020 (current month); 6 days in May 2020 (random month); 6 days in December 2019 (random month).	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	G1: If yes, % of workers & frequency: Not applicable (the normal working hours were 8 hours per day and 40 hours per week)
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	H1: If yes, please give details: Not applicable (there was no any working time waiver)
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Highest daily, weekly and monthly overtime hours as below: 2 overtime hours per day, 10 overtime hours per week and 36 overtime hours per month in July 2020 (current month); 2 overtime hours per day, 12 overtime hours per week and 36 overtime hours per month in May 2020 (random month); 2 overtime hours per day, 8 overtime hours per week and 32 overtime hours per month in December 2019 (random month)	
J: Combined hours (standard or contracted)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

+ overtime hours = total) over 60 found? Please give details:		
K: Approximate percentage of total workers on highest overtime hours:	___33.3___%	
L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information	<i>L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:</i> The voluntary overtime policy was provided for review. Regular trainings on voluntary overtime policy were provided for all workers. Through worker interview and documentation review, it was confirmed that overtime was voluntary. The workers could refuse the overtime arrangement without any punishment or negative impact.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	<i>M1: Please give details of normal day overtime premium as a % of standard wages:</i> 150% of the normal wages were provided for the overtime hours on weekdays in the sampled months for 100% workers. Remark: Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months for 100% workers.
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<i>N1: If yes, please describe % of workers & frequency:</i> 1. Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months for 100% workers. 2. The workers' wages including normal wages and overtime wages etc. of one month was paid on or before the 12th day of the following month.
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other Not applicable	

complete the boxes where relevant.	<p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> <p>Not applicable. Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months for 100% workers.</p>
<p>P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.</p>	<p><input type="checkbox"/> Overtime is voluntary</p> <p><input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week</p> <p><input type="checkbox"/> Safeguards are in place to protect worker's health and safety</p> <p><input type="checkbox"/> Site can demonstrate exceptional circumstances</p> <p><input type="checkbox"/> Other reasons (please specify)</p> <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> <p>Not applicable (the workers' working time was no more than 60 hours per week)</p>
<p>Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Q1: If yes, please give details: the factory management said overtime hours were caused by labour shortages and tight delivery date of the purchase orders, etc.</p>
<p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>The management stated that the factory planned to take the actions such as hiring more workers, enhancing production efficiency, implementing new working time arrangement including controlling the number of the overtime hours, consulting the delivery date of the purchase orders with end clients, etc. to control and reduce the workers' overtime hours, and ensure the overtime was the exception rather than the normal practice.</p>

7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

ETI

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:

- The factory had anti-discrimination policy and procedure;
- There were the regular trainings on anti-discrimination for the workers;
- All interviewed workers spoke highly of the employer;
- The factory did not require workers to do the examination of the hepatitis B virus and HIV;
- The factory did not require female workers to do the examination of pregnant test;
- There was no gender discrimination in the factory; both female and male workers were distributed in all types of work;
- There was no evidence of sexual harassment;
- There was 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 in the factory;
- There was an internal grievance process, all sampled workers were aware of the grievance channels in case they encountered any discrimination cases.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- The anti-discrimination policy and procedure;
- The regular training records on anti-discrimination;
- The hiring and termination procedure, leave application records and employing handbook.
- Payrolls
- Attendance records
- Termination records
- Management interview and worker interview

Any other comments:

Nil

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: __50__ % A2: Female __50__ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	0

<p>C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:</p>	<p> <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input checked="" type="checkbox"/> No evidence of discrimination found </p> <p>C1: Please give details: no any discrimination about hiring, compensation, access to training, promotion, termination or retirement was found.</p>
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Professional Development	
<p>A: What type of training and development are available for workers?</p>	<p>The on-going work skill trainings were available for all workers to progress and develop. The criteria for promotion, training and compensation were equal, fair and transparent for all workers.</p>

<p>B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No </p> <p>If no, please give details: Not applicable (HR decisions e.g. promotion, training and compensation were equal, fair and transparent for all workers)</p>
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Non-compliance:	
<p>1. Description of non-compliance:</p> <p> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed </p> <p>Local law and/or ETI requirement: Not applicable</p> <p>Recommended corrective action: Not applicable</p>	<p>Objective evidence observed: (where relevant please add photo numbers) Not applicable</p>

Observation:

Description of observation: None observed Local law or ETI requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable
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Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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 factory had the legal employment relationship. The workers were recruited by the facility directly. The factory signed labour contracts with all workers upon hiring and re-signed the labour contracts when the labour contracts expired. All workers received the copies of their labour contracts.
2. The factory had complied with obligations to workers arising from the regular employment relationship.
3. The factory had full understanding of the entire recruitment process. The written recruitment policy and procedure were established and implemented in the factory. The factory provided the regular trainings about the recruitment policy and procedure for all workers. The interviewed factory management and workers understood of the entire recruitment process.
4. There was the effective management system to identify and monitor the hiring and management of all workers. The local workers and migrant workers were hired legally and treated equally in the facility.
5. There was no temporary worker and apprenticeship scheme in the factory. No home-working existed in the factory.
6. The factory did not require workers to pay any recruitment fee at any stage of the recruitment process, which was confirmed by interviews with management and workers as well as reviewing of the written recruitment policy and procedure, the recruitment notice at gate, payrolls, etc.
7. The factory had the labour contracts for the workers. The labour contracts were signed by workers themselves. The interviewed workers knew clearly the contents of the labour contracts. The terms and conditions stated in the contracts accurately reflected the agreed payment and terms in the recruitment process and complied with local laws.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Personal files with labour contracts and ID copies for the workers
- Recruitment policy and procedure
- Trainings records about the recruitment policy and procedure
- The recruitment notice at gate
- Payroll records
- Management interview and worker interview

Any other comments:

Nil

Non-compliance:
1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)
Not applicable

Observation:
Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:

Not applicable

Good Examples observed:
Description of Good Example (GE):

None observed

Objective Evidence Observed:

Not applicable

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: not applicable (no negative condition was found about it)
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please describe details and specific category(ies) of workers affected: not applicable (workers need not pay any fee, taxes, deposit or bond at any stage of the employment)
C: If yes, check all that apply:	<input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other – C1: If other, please give details: Not applicable (workers need not pay any fee, taxes, deposit or bond at any stage of the employment)
D: If any checked, give details:	Not applicable (workers need not pay any fee, taxes, deposit or bond at any stage of the employment)

Migrant Workers:

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

A: Type of work undertaken by migrant workers:	Most types of work included migrant workers.
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<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>B1: Total number of (in country recruitment agencies) used: none</p> <p>B2: Total number of (outside of local country) recruitment agencies used: none</p> <p>All migrant workers were recruited by the factory directly.</p>	
<p>C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>C1: Please describe finding: Not applicable (there was no such kind of deduction from the workers' wages)</p>	<p>C2: Observations: Not applicable (there was no such kind of deduction from the workers' wages)</p>
<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>D1: If yes, number and example of roles: 10 management staff came from the migrant workers.</p>	

NON-EMPLOYEE WORKERS

Recruitment Fees:	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Not applicable (there was no non-employee worker in the facility)</p>
<p>B: If yes, check all that apply:</p>	<p><input type="checkbox"/> Recruitment / hiring fees <input type="checkbox"/> Service fees <input type="checkbox"/> Application costs <input type="checkbox"/> Recommendation fees <input type="checkbox"/> Placement fees <input type="checkbox"/> Administrative, overhead or processing fees <input type="checkbox"/> Skills tests <input type="checkbox"/> Certifications <input type="checkbox"/> Medical screenings <input type="checkbox"/> Passports/ID's <input type="checkbox"/> Work / resident permits <input type="checkbox"/> Birth certificates <input type="checkbox"/> Police clearance fees <input type="checkbox"/> Any transportation and lodging costs after employment offer <input type="checkbox"/> Any transport costs between work place and home <input type="checkbox"/> Any relocation costs after commencement of employment <input type="checkbox"/> New hire training / orientation fees <input type="checkbox"/> Medical exam fees <input type="checkbox"/> Deposit bonds or other deposits <input type="checkbox"/> Any other non-monetary assets <input type="checkbox"/> Other</p>

	B1 – If other, please give details: Not applicable (there was no non-employee worker in the facility)
C: If any checked, give details:	Not applicable (there was no non-employee worker in the facility)

Agency Workers (if applicable) <i>(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.)</i>	
A: Number of agencies used (average):	A1: Names if available: Not applicable (there was no agency worker in the facility)
B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable (there was no agency worker in the facility)
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No Not applicable (there was no agency worker in the facility)
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: Not applicable (there was no agency worker in the facility)
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: Not applicable (there was no agency worker in the facility)

Contractors: <i>Note: 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,</i>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: Not applicable (there was no contractor in the facility)
B: If Yes , how many workers supplied by contractors?	Not applicable (there was no contractor in the facility)
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: Not applicable (there was no contractor in the facility)

D: If Yes , please give evidence for contractor workers being paid per law:	Not applicable (there was no contractor in the facility)
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8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

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

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

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

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 factory had established a policy to ensure sub-contracting would not be used unless previously agreed with the main clients.
- The factory's all processes were finished within the factory.
- The factory did not use sub-contracting
- The factory did not use home-working.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

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

If any processes are sub-contracted – please populate below boxes

Not applicable (there was no sub-contracted process in the factory)

Details:

Not applicable (there was no sub-contracted process in the factory)

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI /Additional Elements requirement: Not applicable Recommended corrective action: Not applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Not applicable
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Observation:	
Description of observation: None observed Local law or ETI/Additional elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

Summary of sub-contracting – if applicable <input checked="" type="checkbox"/> Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe:
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If Yes , summarise details:
C: Number of sub-contractors/agents used:	
D: Is there a site policy on sub-contracting?	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If Yes , summarise details:

E: What checks are in place to ensure no child labour is being used and work is safe?	
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Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If Yes , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to summary of findings\)](#)

ETI

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.

Additional elements:

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

<p>A: 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?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>A1: Please give details: The factory had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e. Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the factory.</p>
<p>B: If Yes, are workers aware of these channels and have access? Please give details.</p>	<p>The worker interviews and onsite observation showed that the workers were aware of these channels and can access these channels freely for reporting any violations without fear of reprisal towards them.</p>
<p>C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.</p>	<p>The factory had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e.</p>

	Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the factory.
D: Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Workers <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input checked="" type="checkbox"/> Other D1: Please give details: The factory had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e. Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the factory.
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details: not applicable (there was no any open dispute about it in the factory)
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details Remark: according to management interview and document review, the factory provided individuals and communities with access to effective grievance mechanisms, also encouraged its business partners (e.g. suppliers) to do so.
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain Remark: The transparent disciplinary procedure was established, published and implemented in the factory.
H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details Remark: The transparent disciplinary procedure was communicated to the workers through posting it on notice boards and regular trainings. The interviewed workers knew clearly this disciplinary procedure.

<p>I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>11: If yes, please give details Remark: The factory had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination. No monetary fine was used as disciplinary measure.</p>
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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 factory had established anti-harsh or 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. Worker interviews confirmed that they were aware of the anti-harsh or inhumane treatment policy, and there was no physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation in the factory.
- The factory had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination. No monetary fine was used as disciplinary measure. Worker interviews confirmed that they were aware of the disciplinary procedure and there was no monetary fine.
- The factory had communicated the anti-harsh or inhumane treatment policy and the disciplinary procedure to the workers through regular trainings. Worker interviews confirmed that they attended these trainings regularly.
- The factory had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings. The designation paper for the responsible person was provided for review. Additionally, the clients' Code of Conducts, which were written in the workers understandable language (i.e. Chinese) and listed hotlines and websites for the workers to report any violations, were posted on the notice boards of the factory. Worker interviews confirmed that they were aware of this system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- The anti-harsh or inhumane treatment policy and the disciplinary procedure; the grievance mechanisms; the designation paper of the responsible person for the grievance mechanism
- Training records regarding anti-harsh or inhumane treatment policy and disciplinary procedure
- Internal grievance procedure
- Facility tour
- Management interview and worker interview

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI
 ☐ NC against Local Law
 ☐ NC against customer code:
 None observed

Local law and/or ETI requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:
 (where relevant please add photo numbers)
 Not applicable

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Not applicable

Comments:

Not applicable

Objective evidence observed:
 Not applicable

Good Examples observed:

Description of Good Example (GE):

None observed

Objective Evidence Observed:
 Not applicable

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

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

10A.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:

- The factory's all workers were Chinese. The local workers and migrant workers were hired legally and treated equally in the facility.
- In the audited factory, all migrants came from other provinces out of Guangdong province in China, such as Guizhou, Guangxi, Hunan, and Jiangxi provinces, etc.
- The factory's all workers had the proper legal rights to work in this region.
- The audited facility's youngest worker was 19 years old.
- There was no foreign worker in the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Hiring procedure
- Personnel files with labour contracts and ID copies
- Employing handbook
- Facility tour
- Management interview and worker interview

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed

Local law and/or ETI /Additional Elements requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation:	
Description of observation: None observed Local law or ETI/Additional Elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

10. Other issue areas 10B4: Environment 4–Pillar

[\(Click here to return to summary of findings\)](#)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

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

10B4.2 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.

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

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

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

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

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

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

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

B4. Guidance for Observations

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

10B4.11 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:

10B4.1. The factory met the local and national environmental related laws and no violation of environmental related laws was found in the audit.

10B4.2. The factory obtained the valid environmental certificates and reports, e.g. Environment Impact Assessment Report, Environment Impact Assessment Approval, and the monitoring testing report for pollutants.

10B4.3. Based on interviews with the factory management, it was confirmed that they were clearly aware of their end clients' environmental requirements. The factory established a system to monitor its performance against these environmental requirements.

10B4.4. The factory established the environmental protection policy with commitment of complying with environmental laws and continuous improvement; waste water, noise and waste gas were identified as key environmental impacts, and the environmental pollution emergency plan was also established in the factory. The factory provided the training regarding the environmental protection policy to the workers

regularly, and provided the environmental protection policy to its suppliers and asked the suppliers to read it carefully and sign the commitment agreement of complying with the factory's environmental protection policy and the national environmental laws.

10B4.5. The interviewed factory management was clearly aware of its significant environmental impact and processes and stated their pollutants included waste water, noise and waste gas, which was consistent with the environmental impact assessment report and the environmental impact assessment approval.

10B4.6. The factory measured and monitored its environmental impact factors including monthly recording and quarterly reviews of use and discharge of natural resources, e.g. energy and water, and a matrix report was kept on file.

10B4.7. The factory made continuous improvements in their environmental performance. E.g. saving the energy and reducing the consumption of water and electricity, etc.

10B4.8. The factory had established environmental management system, and provided the environmental policy, procedure and documentation (such as environmental certificates, reports and records) for reviewing during the audit.

10B4.9. There was the appointed responsible person for coordinating the factory's efforts to improve environmental performance. The written appointment paper was provided for reviewing.

10B4.10. The factory completed the appropriate environment section of the SAQ.

10B.4.11. Through viewing the local government websites and interviews with factory management, it was confirmed that the factory had not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. The local and national environmental related laws;
2. The valid environmental certificates and reports, e.g. Environment Impact Assessment Report, Environment Impact Assessment Approval, and the monitoring testing report for pollutants (latest test date: 24 June 2020);
3. The factory's end clients' environmental requirements; environmental training records; internal environmental inspections and audit reports;
4. Environmental protection policy; environmental pollution emergency plan; the suppliers' commitment agreements of complying with the factory's environmental protection policy and the national environmental laws;
5. Documentation about use and discharge of natural resources;
6. Continuous improvement plan in the environmental performance;
7. Environmental procedure and records (e.g. electrical bill, waste bill, waste list and collection records);
8. Appointment paper of environment responsible person;
9. SAQ in Sedex website;
10. Viewing the local government websites;
11. Interviews with factory management and non-management workers
12. Site tour

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance: <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code: None observed Local law and/or ETI/Additional Elements requirement: None applicable Recommended corrective action: None applicable	Objective evidence observed: <i>(where relevant please add photo numbers)</i> None applicable
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Observation:	
Description of observation: None observed Local law or ETI/Additional elements requirements: None applicable Comments: None applicable	Objective evidence observed: None applicable

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: None applicable

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Jack Lam (General manager)
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The factory had conducted regular risk assessment on the environmental impact and waste water, noise and waste gas were the identified main environmental impacts of the factory, and the factory took some actions to reduce identified environmental risks accordingly.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please give details: The facility did not obtain the environmental system certificate.
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? The factory's environmental policy was publicly available. The environmental policy was posted on the factory's notice boards and communicated to its workers and suppliers regularly.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The factory established the environmental protection policy with commitment of complying with environmental laws and continuous improvement; waste water, noise and waste gas were identified as key environmental impacts, and the environmental pollution emergency plan was also established in the factory.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No G1: Please give details: The factory did not have such environmental system certification.
H: Have all legally required permits been shown? Please give details.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: The factory obtained the valid environmental certificates and reports, e.g. Environment Impact Assessment Report, Environment Impact Assessment Approval, and the monitoring testing report for pollutants.

<p>I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: The used hazardous chemicals included cleanser, lubricating oil, etc. and the chemical list was available for review.</p>
<p>J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: The HR staff studied and collected the latest environmental and chemical requirements from the authorities both the end clients located countries and the factory located country (i.e. China) and from the end clients regularly through communicating with end clients or internet, then provided the trainings to both management staff and non-management workers and implemented the updated & strictest environmental and chemical standards in the factory. The factory had the internal audit team and the internal audit team conducted regular internal inspections and audits against the updated & strictest environmental and chemical requirements and standards, if any violation about environment or chemical was found, the internal audit team would analyse the root cause, take corrective and preventive actions accordingly.</p>
<p>K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: The reduction targets for environmental aspects such as water consumption and discharge, waste, energy and green-house gas emissions were available for review.</p>
<p>L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: The factory had provided the monthly waste recycling and volume monitoring records for review.</p>
<p>M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: The factory had provided the monthly consumption and monitoring data of key utilities of water, energy and natural resources that followed recognised protocols or standards for review.</p>
<p>N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: Not applicable (there was no any sub-contracting agency or business partner operating on the premise in the factory)</p>

Usage/Discharge analysis		
Criteria	Previous year: Please state period: August 2018 to July 2019	Current Year: Please state period: August 2019 to July 2020
Electricity Usage: Kw/hrs	277751 Kw/hrs	217601 Kw/hrs
Renewable Energy Usage: Kw/hrs	None	None
Gas Usage: Kw/hrs	None	None
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes , please state result	Not applicable (no carbon footprint analysis was conducted by the factory)	Not applicable (no carbon footprint analysis was conducted by the factory)
Water Sources: Please list all sources e.g. lake, river, and local water authority.	<ul style="list-style-type: none"> Local water authority 	<ul style="list-style-type: none"> Local water authority
Water Volume Used: (m ³)	5512 m ³	4981 m ³
Water Discharged: Please list all receiving waters/recipients.	<ul style="list-style-type: none"> Municipal sewage network 	<ul style="list-style-type: none"> Municipal sewage network
Water Volume Discharged: (m ³)	5236 m ³	4731 m ³
Water Volume Recycled: (m ³)	0	0
Total waste Produced (please state units)	<p>Waste water: 5236 m³;</p> <p>Living waste and other non-recyclable waste: 2400 kilograms;</p> <p>Recyclable waste: (1) waste packing materials and papers: 4800 kilograms; (2) waste production materials: 6800 kilograms;</p> <p>Hazardous waste: 160 kilograms</p>	<p>Waste water: 4731 m³;</p> <p>Living waste and other non-recyclable waste: 1900 kilograms;</p> <p>Recyclable waste: (1) waste packing materials and papers: 4000 kilograms; (2) waste production materials: 5900 kilograms;</p> <p>Hazardous waste: 120 kilograms</p>

Total hazardous waste Produced: (please state units)	Hazardous waste: 160 kilograms	Hazardous waste: 120 kilograms
Waste to Recycling: (please state units)	Recyclable waste: (1) waste packing materials and papers: 4800 kilograms; (2) waste production materials: 6800 kilograms;	Recyclable waste: (1) waste packing materials and papers: 4000 kilograms; (2) waste production materials: 5900 kilograms;
Waste to Landfill: (please state units)	0	0
Waste to other: (please give details and state units)	0	0
Total Product Produced (please state units)	10000000 pieces in this year	8000000 pieces in this year

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

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

10C.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.

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

10C.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.

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

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

10C.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

10C.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.

10C.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:

10C.1 The factory conducted their business ethically and no bribery, corruption or fraudulent business practice was found in the audit. The factory management received, signed, stamped and complied with the audit company's written business ethics documents in the audit.

10C.2 The factory collected and provided the legal laws about business ethics and end clients' business ethics standards, and met the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices and their end clients' business ethics standards.

10C.3 The factory complied with all fiscal legislative requirements and all fiscal documents and data such as income, expense and profit data, were submitted and verified by the local government regularly.

10C.4 The factory had a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter, and the interviewees knew these confidential reporting methods, e.g. the workers could use suggestion boxes and the posted telephone number and email address to report unethical business practice directly or anonymously and the facility management will deal with it and response to the reporter afterwards.

10C.5 The factory established and implemented the written Business Ethics policy concerning bribery, corruption, or fraudulent Business Practice, and this Business Ethics policy clearly defined what behaviours were unacceptable.

10C.6 The factory had the appointed responsible person for implementing the factory's Business Ethics policy. The written appointment paper was provided for reviewing.

10C.7 The factory provided the trainings regularly on what action to take in the event of an issue arising in their areas for the persons with jobs of higher level of risks about ethical Business Practice e.g. sales, purchasing, logistics and financial staff; and the regular training records were provided for reviewing.

10C.8 The factory posted Business Ethics policy in the notice boards of the factory. The factory provided the training regarding the Business Ethics policy to the workers regularly, and provided the Business Ethics policy to the third parties including its suppliers and asked the third parties including the suppliers to read it carefully and sign the commitment agreement of complying with the factory's Business Ethics policy.

10C.9 The factory had not been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations according to the local government websites and interviews with factory management.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

1. The audit company's written business ethics documents with factory responsible person's signature and stamp;
2. The legal laws about business ethics and end clients' business ethics standards;
3. The factory's fiscal documents and data such as income, expense and profit data;
4. The confidential reporting and dealing methods of unethical Business Ethics;
5. The factory's Business Ethics policy;
6. Appointment paper for the responsible person for implementing the factory's Business Ethics policy;
7. Training records about business ethics policy;
8. The suppliers' commitment agreement of complying with the factory's Business Ethics policy;
9. Viewing the local government websites;
10. Interviews with factory management and non-management workers
11. Onsite observation

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

None observed

Local law and/or ETI/Additional Elements requirement:

Not applicable

Recommended corrective action:

Not applicable

Objective evidence observed:

(where relevant please add photo numbers)

Not applicable

Observation	
Description of observation: None observed Local law or ETI/Additional elements requirement: Not applicable Comments: Not applicable	Objective evidence observed: Not applicable

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers A1: Please give details: The factory established and implemented the written Business Ethics policy concerning bribery, corruption, or fraudulent Business Practice, and this Business Ethics policy clearly defined what behaviours were unacceptable. The Business Ethics policy was posted out in the notice boards of the factory. The factory provided the training regarding the Business Ethics policy to the workers regularly, and provided the Business Ethics policy to the third parties including its suppliers and asked the third parties including the suppliers to read it carefully and sign the commitment agreement of complying with the factory's Business Ethics policy.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: The factory provided the trainings regularly on what action to take in the event of an issue arising in their areas for the persons with jobs of higher level of risks about ethical Business Practice e.g. sales, purchasing, logistics and financial staff; and the regular training records were provided for reviewing.
C: Is the policy updated on a regular (as needed) basis?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: The factory established and implemented the written Business Ethics policy concerning bribery, corruption, or fraudulent Business Practice, and

	this Business Ethics policy clearly defined what behaviours were unacceptable. The factory checked and updated the written Business Ethics policy regularly.
D: Does the site require third parties including suppliers to complete their own business ethics training	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: Please give details: The factory required third parties including suppliers to complete their own business ethics trainings regularly.

Other findings

Other Findings Outside the Scope of the Code
None observed

Community Benefits <i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i>
None observed

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."



☒ Not Applicable please x

Photo Form




Best Practice Photos:
















None observed	None observed	None observed
N/A	N/A	N/A















Non-compliance Photos:

		Nil
NC photo 1: 2 out of 4 cleanser using workers in the packing workshop on the 3F of the production building wore the cotton gloves instead of the rubber gloves, and did not wear the active carbon masks in work.	NC photo 2: 1 barrel of cleanser (with total volume of around 40 L) was used in the packing workshop on the 3F of the production building, but there was no secondary containment for it.	Nil

General Photos:

		
Facility name	Facility gate	Production building
		
Cutting process	Electrical pressing process	Sewing process

		
Packing process	Raw material warehouse	Finished goods warehouse
		
Anti-explosion light	Lamp lit evacuation direction sign	Fire hydrant
		
Fire extinguishers	Fire alarm	"No smoking" sign
		
Exit sign and emergency light	Evacuation plan	Electrical box with warning sign
		
Suggestion box	Drinking facility	Washroom

		
Attendance machine	First aid kit	Notice board
		
Chemical cabinet	MSDS available onsite	Eye washing facility
		
PPE usage sign	Needle guard for sewing machine	Pulley guard for sewing machine
		
Dormitory building	Bedroom	Toilet in bedroom
		Nil

Kitchen	Canteen	Nil
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