



Sedex Members Ethical Trade Audit Report

Version 6.1



| Audit Details | | | | |
|---|--|---|---|--|
| Sedex Company Reference: <i>(only available on Sedex System)</i> | ZC: 1015717 | Sedex Site Reference: <i>(only available on Sedex System)</i> | ZS: 1010052 | |
| Business name (Company name): | Huidong County Huangbu Kang Fu Lai Shoes Factory | | | |
| Site name: | Huidong County Huangbu Kang Fu Lai Shoes Factory 惠东县黄埠康富来鞋厂 | | | |
| Site address: <i>(Please include full address)</i> | Actual Address: No.3 Lane 5, Wenhua Street, Binhe Road, Dakeng Village, Huangbu Town, Huidong County, Huizhou City, Guangdong Province, China. 广东省惠州市惠东县黄埠镇大坑滨河路文华街 5 巷 3 号 Business License Address: Dakeng, Huangbu Town, Huidong County. 惠东县黄埠镇大坑 Remark: The business license address is only the registered address, the actual address is more details, they are the same. | Country: | China | |
| Site contact and job title: | Mrs. Cao Zeying/Plant Manager | | | |
| Site phone: | 86-752-8691585 | Site e-mail: | kangfulaishoes@126.com | |
| SMETA Audit Pillars: | <input checked="" type="checkbox"/> Labour Standards | <input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar) | <input type="checkbox"/> Environment 4-pillar | <input type="checkbox"/> Business Ethics |
| Date of Audit: | 11 Oct. 2021 | | | |

| | |
|--|---|
| <p>Audit Company Name & Logo: SGS-CSTC Standards Technical Services Co., Ltd.</p>  | <p>Report Owner (payer): CENTRAL PARK SHOES (HK) LTD</p> |
|--|---|

| 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) | | | |

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit <https://www.sedex.com/audit-verifier/>

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): Nil

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

Lead auditor: Shawn Li APSCA number: CSCA21701877

Lead auditor APSCA status: CSCA

Team auditor: Nil APSCA number: Nil

Interviewers: Shawn Li APSCA number: CSCA21701877

Report writer: Shawn Li

Report reviewer: Vera Sun

Date of declaration: 11 Oct. 2021

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 <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i> Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained. | Area of Non-Conformity <i>(Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)</i> | | | | Record the number of issues by line*: | | | Findings <i>(note to auditor, summarise in as few words as possible NCs, Obs and GE)</i> |
|---|--|-------------------------------------|--------------------------|--------------------------|---------------------------------------|-----|----|---|
| | 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 | 0 | Nil |
| 0B Management systems and code implementation | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 1 | 0 | Summary of Non-Compliance finding: Nil Summary of Observation finding: 1. The factory did not conduct social responsibility audit for suppliers. Summary of GE: Nil |
| 1. Freely chosen Employment | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 2. Freedom of Association | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 3. Safety and Hygienic Conditions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | 2 | 0 | 0 | Summary of Non-Compliance finding: 1. Based onsite observation, 2 sewing machines were missing belt pulley safety guard in 3/F stitching workshop. 2. Based onsite observation, the water pressure of two eyes washing facility was not enough for use in 2/F & 3/F workshop. Summary of Observation finding: Nil Summary of GE: |

| | | | | | | | | | |
|------|--|-------------------------------------|-------------------------------------|--------------------------|--------------------------|-----|-----|-----|---|
| | | | | | | | | | Nil |
| 4 | <u>Child Labour</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 5 | <u>Living Wages and Benefits</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | 1 | 0 | 0 | Summary of Non-Compliance finding: 1. The factory did not provide social insurance for partial employees. Summary of Observation finding: Nil Summary of GE: Nil |
| 6 | <u>Working Hours</u> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | <input type="checkbox"/> | 1 | 0 | 0 | Summary of Non-Compliance finding: 1. Workers' monthly overtime hours exceeded legal requirement. Summary of Observation finding: Nil Summary of GE: Nil |
| 7 | <u>Discrimination</u> | <input type="checkbox"/> | <input type="checkbox"/> | | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 8 | <u>Regular Employment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 8A | <u>Sub-Contracting and Homeworking</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 9 | <u>Harsh or Inhumane Treatment</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 10A | <u>Entitlement to Work</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 10B2 | <u>Environment 2-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 0 | 0 | 0 | Nil |
| 10B4 | <u>Environment 4-Pillar</u> | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |

| | | | | | | | | | |
|-----|-----------------|--|--------------------------|--------------------------|--------------------------|-----|-----|-----|-----|
| 10C | Business Ethics | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | N/A | N/A | N/A | N/A |
|-----|-----------------|--|--------------------------|--------------------------|--------------------------|-----|-----|-----|-----|

General observations and summary of the site:

- The factory was established on 4 April 2005 per the business license.
- The product manufactured in the factory was shoes.
- The main manufacturing processes were Cutting -> Lasting-> Stitching -> Inspection -> Packing
- The factory established a management system to manage the social accountability issues in the factory. Mrs. Cao Zeying/Plant Manager was appointed as senior member of management to responsible for compliance with ETI code.
- There were total 89 employees including 22 local worker and 67 migrant workers from other provinces except of Guangdong province.
- The youngest worker in the factory was 18 years old, who was born on 18 Aug. 2003 and entered the factory on 10 Sept. 2021.
- The peak season was not obvious.
- 10 workers were selected for interview, including 5 male workers and 5 female workers. They were interviewed as 1 group with 4 workers per group and 6 workers were interviewed individually. All workers said they were satisfied with their employment at the factory. They also said they were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.
- Standard working time was 5 days per week and 8 hours per day.
- Based on provided payroll records and management interview, it was noted all workers were paid by hourly rate.
- The local legal minimum wage was RMB1550/month (RMB8.91 per hour) since 1 July 2018.
- Minimum wage guarantee system was established for all workers. Based on attendance records and payroll records provided by the factory, it was noted workers' minimum wages were paid meeting the local legal requirement, which was at least RMB1550/month (RMB8.91 per hour).
- Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted the factory paid 150% of normal wage rate for weekday overtime and 200% of normal wage rate for weekend overtime, which was in line with legal requirement. No overtime working on statutory holidays, all workers were rest on statutory holidays and factory would pay normal wage to workers for statutory holidays.
- Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted all sampled workers' monthly overtime hours exceeded 36 hours in each month, the max monthly overtime hours were 94 hours, which happened in July 2021. All sampled workers' weekly hours were controlled within 60 hours; the Max weekly working hours was 60 hours. All workers enjoyed at least one day off per seven days.
- Max overtime hours in samples were as below:
 2 hours/day, 20 hours/week, 84 hours/month in Aug. 2021 (Current month);
 2 hours/day, 20 hours/week, 94 hours/month in July 2021 (Random month);
 2 hours/day, 20 hours/week, 82 hours/month in Nov. 2020 (Random month).
- There were total 89 employees in the factory. According to the social insurance purchase records of Oct. 2021, it was noted that factory only provided social insurances (retirement insurance, medical, unemployment, accident, and child-bearing insurance) to 6 out of total 89 employees.
- Remark: The factory provided the commercial accident insurance to all employees.

- Factory building was in good condition based on onsite observation.
- No child labour and no young workers were identified during the audit.
- No forced labour was identified during the audit.
- One Worker Committee was established in the factory, while 2 worker representatives were elected in the factory. One worker representative attended the opening and closing meeting during this audit.
- Factory established environment management system. Mrs. Cao Zeying/Plant Manager was appointed to response the compliance of environment requirement.

**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: | Huidong County Huangbu Kang Fu Lai Shoes Factory | | | | | | | |
| B: Site name: | Huidong County Huangbu Kang Fu Lai Shoes Factory 惠东县黄埠康富来鞋厂 | | | | | | | |
| C: GPS location: (If available) | GPS Address: No.3 Lane 5, Wenhua Street, Binhe Road, Dakeng Village, Huangbu Town, Huidong County, Huizhou City, Guangdong Province, China. | Latitude: 22° 45' 26'' Longitude: 114° 57' 23'' | | | | | | |
| D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections | Business licence number: 92441323L133876494 Valid from 4 April 2005 to Long time. | | | | | | | |
| E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc | Shoes | | | | | | | |
| F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings) | <p>Huidong County Huangbu Kang Fu Lai Shoes Factory was located at No.3 Lane 5, Wenhua Street, Binhe Road, Dakeng Village, Huangbu Town, Huidong County, Huizhou City, Guangdong Province, China.</p> <p>There were total 89 employees including 22 local worker and 76 migrant workers.</p> <p>The factory was established on 4 April 2005, its production area was about 2,008 square meters, no kitchen/canteen and dormitory were provided by the factory.</p> <p>Based on attendance records provided by the factory, it was noted that one shift was arranged for all workers, it was 08:30-12:00, 13:30-18:00; and if overtime at night was needed, it was start from 19:30 to 21:30 sometimes. Workers overtime worked 2 hours on weekdays, and overtime worked 10 hours on Saturdays. Workers were always rest on Sundays.</p> <p>The audited factory used the one 4-storey production building as office, workshops, and warehouse.</p> <p>Detail as below:</p> <table border="1"> <thead> <tr> <th>Production Building:</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> | | Production Building: | Description | Remark, if any | | | |
| Production Building: | Description | Remark, if any | | | | | | |
| | | | | | | | | |

| | | | |
|---|---|---|--|
| | Floor 1 | Office, cutting workshop and raw-material warehouse | This building built up in the year of 2003 |
| | Floor 2 | Lasting workshop | |
| | Floor 3 | Stitching workshop | |
| | Floor 4 | Lasting workshop and Inspection and package | |
| | Is this a shared building? | No | |
| <p>F1: Visible structural integrity issues (large cracks) observed? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: Based on onsite observation, no visible structural integrity issues such as cracks was found.</p> <p>F3: Does the site have a structural engineer evaluation? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>F4: Please give details: The factory provided building's acceptance certificate for review.</p> | | | |
| 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) | Not obvious | | |
| I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used) | Product: Shoes The main manufacturing processes were Cutting -> Lasting ->Stitching-> Inspection -> Packing. Production Lines: 2 lasting lines Main Equipment: 30 sewing machines, 3 cutting machines and 1 needle detector. | | |
| 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 | | |

| | |
|--|--|
| <p>K: Is there any night production work at the site?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |
| <p>L: Are there any on site provided worker accommodation buildings e.g. dormitories</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, approx. % of workers in on site accommodation</p> |
| <p>M: Are there any off site provided worker accommodation buildings</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No M1: If yes, approx. % of workers</p> |
| <p>N: Were all site-provided accommodation buildings included in this audit</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No N1: If no, please give details N/A, no dormitory was provided by the factory.</p> |

| Audit Parameters | | | |
|--|--|---|---|
| A: Time in and time out | Day 1 Time in: 13:30 Day 1 Time out: 17:30 | Day 2 Time in: N/A Day 2 Time out: N/A | Day 3 Time in: N/A Day 3 Time out: N/A |
| B: Number of auditor days used: | 1 man-day (1 auditor in 1 day) | | |
| C: Audit type: | <input checked="" type="checkbox"/> Full Initial <input 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 type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced | | |
| E: Was the Sedex SAQ available for review? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 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) | Mrs. Cao Zeying/Plant 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: | N/A | | |
| J: Previous audit type: | N/A | | |
| K: Were any previous audits reviewed for this audit | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" 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 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 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 type="checkbox"/> No |
| D: If Worker Representatives were not present please explain reasons why <i>(only complete if no worker reps present)</i> | N/A | | |
| E: If Union Representatives were not present please explain reasons why: <i>(only complete if no union reps present)</i> | No Trade Union established in the factory, while one Worker Committee representative attended the opening and closing meeting. | | |

Worker Analysis

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

| Worker Analysis | | | | | | | | |
|--|-----------|-----------|--------|-----------|-----------|--------|--------------|-------|
| | Local | | | Migrant* | | | Home workers | Total |
| | Permanent | Temporary | Agency | Permanent | Temporary | Agency | | |
| Worker numbers – Male | 14 | 0 | 0 | 36 | 0 | 0 | 0 | 50 |
| Worker numbers – female | 8 | 0 | 0 | 31 | 0 | 0 | 0 | 39 |
| Total | 22 | 0 | 0 | 67 | 0 | 0 | 0 | 89 |
| Number of Workers interviewed – male | 2 | 0 | 0 | 3 | 0 | 0 | 0 | 5 |
| Number of Workers interviewed – female | 1 | 0 | 0 | 4 | 0 | 0 | 0 | 5 |
| Total – interviewed sample size | 3 | 0 | 0 | 7 | 0 | 0 | 0 | 10 |



| | | |
|--|--|--|
| A: Nationality of Management | Chinese | |
| <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> Chinese </u></p> <p>B2: Nationality 2: <u> Nil </u></p> <p>B3: Nationality 3: <u> Nil </u></p> | <p>Was the list completed during peak season?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>If no, please describe how this may vary during peak periods:</p> <p>NA, the peak season was not obvious.</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> </u></p> <p>C2: approx % total workforce: Nationality 3 <u> </u></p> | |
| D: Worker remuneration <i>(management information)</i> | <p>D: <u> </u>% workers on piece rate</p> <p>D1: <u> 100 </u>% hourly paid workers</p> <p>D2: <u> </u>% salaried workers</p> <p>Payment cycle:</p> <p>D3: <u> </u>% daily paid</p> <p>D4: <u> </u>% weekly paid</p> <p>D5: <u> 100 </u>% monthly paid</p> <p>D6: <u> </u>% other</p> <p>D7: If other, please give details</p> | |



| Worker Interview Summary | |
|--|--|
| A: Were workers aware of the audit? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Were workers aware of the code? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| C: Number of group interviews: <i>(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)</i> | 1 group with total 4 workers |
| D: Number of individual interviews <i>(Please see SMETA Best Practice Guidance and Measurement Criteria)</i> | 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? | No worker complained anything. |
| I: What did the workers like the most about working at this site? | Most workers said that they were satisfied with the wages and working environment. |
| J: Any additional comment(s) regarding interviews: | NA |
| K: Attitude of workers to hours worked: | Most workers enjoyed working at this factory, they felt they had sufficient work and had a good relationship with management in general. |
| L. Is there any worker survey information available? | |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No L1: If yes, please give details: | |
| 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

10 workers were selected for interview, including 5 male workers and 5 female workers. They were interviewed as 1 group with 4 workers per group and 6 workers were interviewed individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors.

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

Interviewed with the worker committee representative, she said factory managements were very care about workers and paid more attention to deal with workers' suggestion or complain. The worker committee representative showed that the managements were kind and the workplace was comfortable. No negative information was identified.

O: Attitude of managers:

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

The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they had implemented a Health & Safety committee to take care of health and safety concerns. The factory agreed the auditor to access to all facilities, and all requested documents and records were provided in a timely manner. The factory agreed the auditor to take photos and copy relevant documents or records in the factory. The factory agreed the auditor to conduct confidential interviews with employees who were chosen freely without any influence by the factory.

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 a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its suppliers.
2. The factory established a management system to manage the social accountability issues in the factory. Mrs. Cao Zeying/Plant Manager was a designated person responsible for implementing standards concerning Human rights.
3. The factory had a transparent system in place for confidentially reporting, dealing with human rights impacts without fear of reprisals towards the reporter, such as anonymous report hotline or email.

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

Details:

Management interview

Workers interview

Documents review

Any other comments:

Nil

A: Policy statement that expresses commitment to respect human rights?

Yes
 No

| | |
|---|---|
| | A1: Please give details: The factory established the policy which stated that expresses 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: Mrs. Cao Zeying Job title: Plant 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 a transparent system in place for confidentially reporting, dealing with human rights impacts without fear of reprisals towards the reporter. |
| 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) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If no, please give details |
| E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: The factory established the related policy, which was communicated with workers effectively, and all workers' information was kept and locked in HR office. |

| Findings | |
|--|--|
| Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/> Description of observation: Nil Local law or ETI/Additional elements / customer specific requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| Good examples observed: | |
|---|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

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: __6__ % | 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] | 3 % | |
| 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: __1__ % | C2: This year __1__ % |
| 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: Accident records were kept with actions available. | |
| 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 |

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:

- The factory established a management system to manage the social accountability issues in the factory. Mrs. Cao Zeying/Plant Manager was a designated person to be responsible for compliance with ETI code.
- Factory communicated ETI code to all employees, communicated ETI code to all suppliers.
- Based on management interview and document review, it was noted factory conducted internal audit and monitoring of CSR responsibility regularly, conducted management review regularly.
- Based on management interview and document review, factory monitored the compliance of social responsibility for its suppliers regularly.

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

Details:

- Social responsibility policy and procedure.
- Management system.
- Workers interview and management interview
- Document review

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?

Yes

No

A1: Please give details: No such fine or prosecutions were identified.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

Yes

No

B1: Please give details: Policies exist for Forced labour, Health and Safety, Working Hours, No

| | |
|---|--|
| | harsh treatment, Environment and Business Ethics. No negative evidence was found. |
| C: If Yes, is there evidence (an indication) of effective implementation? Please give details. | The factory had established the related policy and provided the training to all related workers to make sure the policy effectively, that was also confirmed via interview with workers and management staffs. |
| 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 had provided the training to 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: The factory provided the training to management and workers. The related record was provided for review. |
| 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). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No F1: Please give details: Nil |
| G: Is there a Human Resources manager/department? If Yes, please detail. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: There was a HR department in the factory. And the manager was Ms. Chen Xiuhui |
| H: Is there a senior person / manager responsible for implementation of the code | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: Mrs. Cao Zeying/Plant Manager was responsible for implementation of the Code. |
| I: Is there a policy to ensure all worker information is confidential? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: Policy was established in employee manual. |
| J: Is there an effective procedure to ensure confidential information is kept confidential? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: Policy was established in employee manual. |
| K: Are risk assessments conducted to evaluate policy and procedure effectiveness? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: Risk assessment was conducted to evaluate policy and procedure effectiveness. |

| | |
|---|---|
| <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: If issues addressed, actions should be taken per interview with management and HR department manager.</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 a policy for its suppliers.</p> |
| <p>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: All required land rights licenses were provided.</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 a system in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title.</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: All required land rights licenses and rent contract were provided for review. Factory did not obtain FPIC.</p> |
| <p>Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No Q1: Please give details: N/A. All required land rights licenses and rent contract were provided for review.</p> |
| <p>R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No R1: Please give details: N/A. All required land rights licenses and rent contract were provided for review.</p> |
| <p>S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No S1: Please give details: N/A. All required land rights licenses and rent contract were provided for review.</p> |

Non-compliance:

| | |
|---|---|
| <p>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: Nil</p> <p>Local law and/or ETI requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |
|---|---|

| Observation: | |
|--|--|
| <p>Description of observation: The factory didn't conduct the social accountability audit for suppliers.</p> <p>Local law or ETI requirement: Additional Elements 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.</p> <p>Comments: Factory should conduct social accountability audit for suppliers regularly.</p> | <p>Objective evidence observed: Management interview and document review</p> |

| Good Examples observed: | |
|---|---|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective evidence observed: Nil</p> |

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:

- The factory established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification.
- The employees obtained their job by recruitment advertising, HR market or by friend's recommendation.
- The workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
- The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- No forced, bonded or involuntary prison labour was identified during the audit.

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

Details:

- Factory rules
- Employee handbook
- Personnel files
- Resignation records
- Contracts
- Management and worker interview

Any other comments:

Nil

| | |
|---|--|
| <p>A: Is there any evidence of retention of original documents, e.g. passports/ID's</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, please give details and category of workers affected:</p> |
| <p>B: Is there any evidence of a loan scheme in operation</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No B1: If yes, please give details and category of worker affected:</p> |
| <p>C: Is there any evidence of retention of wages /deposits</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: If yes, please give details and category of worker affected:</p> |

| | |
|---|--|
| D: Are there any restrictions on workers' freedom to terminate employment? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No D1: Please describe finding: The workers could terminate employment freely. |
| 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: |
| 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: Based on worker interview, workers were free to leave the site at the end of the working day. |
| G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable G1: If yes, please give details and category of workers affected: No forced/ trafficked / bonded labour was identified in its supply chain. |
| H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: Please describe finding: The factory had established the effective employment policies, and it was implemented by HR department. No restrictions on movement of the employees in the factory; and HR department would verify ID copies without any retention during recruitment process. In addition, employees could be freely resignation after communication with management in advance 30 days notification. |

| Non-compliance: | |
|---|--|
| <p>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: Nil</p> <p>Local law and/or ETI requirement Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Observation: | |
|--|--|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement:</p> | <p>Objective evidence observed: Nil</p> |

| | |
|--|--|
| <p>Nil</p> <p>Comments: Nil</p> | |
|--|--|

| Good Examples observed: | |
|--|--|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective evidence observed: Nil</p> |

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 Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All-China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.
- Based on document review, management review and workers interview, one Worker Committee was established in the factory. While 2 worker representatives were elected in the factory. One worker committee representative attended the opening and closing meeting during this audit.
- The factory management and worker committee representatives would conduct meeting regularly; the meeting records were provided for review.
- Through workers interview, the worker could rise up their opinion through worker committee representatives or communicate with their supervisors.
- Workers could raise their grievances or complaint to their worker committee representatives or management directly.

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

Details:

- The policy on freedom of association
- Interview with workers and management
- Interview with worker committee representative
- Worker committee representatives elected records and meeting records

Any other comments:

Nil

A: What form of worker representation/union is there on site?

- Union (name)
- Worker Committee
- 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: The employees could complain to team leaders, supervisors directly and can also through worker representatives and suggestion box. 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: There was a meeting room available for the worker committee representatives for a meeting. | |
| F: Name of union and union representative, if applicable: | N/A | 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, one Worker Committee established in the factory. While 2 worker representatives were elected in the factory. | 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 | |
| I: Were worker representatives freely elected? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2 worker representatives were elected in the factory. | I1: Date of last election: 10 Sept. 2021. |
| J: Do workers know what topics can be raised with their representatives? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| 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. | |
| L: Please describe any evidence that union/worker's committee is effective? | The factory management and worker representatives would conduct meeting regularly. The meeting topic was about communication among workers, representatives, factory benefits etc, related meeting records were provided for review. | |

| | | |
|--|---|---|
| Specify date of last meeting; topics covered; how minutes were communicated etc. | The last worker committee meeting was conducted on 10 Sept. 2021. | |
| M: Are any workers covered by Collective Bargaining Agreement (CBA)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No collective bargaining agreement in the factory. | |
| If Yes , what percentage by trade Union/worker representation | M1: _N/A_ % workers covered by Union CBA | M2: _N/A_ % workers covered by worker rep CBA |
| M3: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay? | <input type="checkbox"/> Yes <input type="checkbox"/> No N/A. No collective bargaining agreement in the factory. | |

| Non-compliance: | |
|---|---|
| <p>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: Nil</p> <p>Local law and/or ETI requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Observation: | |
|--|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good Examples observed: | |
|---|---|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective evidence observed: Nil</p> |

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
 - Mrs. Cao Zeying/Plant Manager was responsible for issue of Health & Safety in the factory.
 - Minutes of meetings show that there were monthly meetings between H&S committee and H&S management.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Sufficient clean toilets segregated by gender were available at all times to workers.
 - The factory provided potable water to workers free of charge in workshops.
1. Fire Safety
 - Evacuation plans were posted in workshops and warehouse, and they were understood by all interviewed workers.
 - Sufficient fire-fighting equipment such as fire extinguishers and hydrants in production building. Regular inspection was taken by the factory per month.
 - Fire drill was conducted twice per year, the latest one was conducted on 3 June 2021, which covered all workers and areas, the records were provided for review.
3. Electrical safety
 - Most parts of electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - One competent electrician was available in the factory, and the electrician certificate was provided for review.
4. Chemicals
 - Chemical list and MSDS were available.
 - Chemicals were stored in secondary containment with safety label.
5. Medical services
 - First aid kits were available for each workshop.
 - 3 qualified first aiders were available in the factory.
6. PPE
 - The factory provided PPEs for workers where necessary freely.
 - Related warning signs were posted onsite.

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

Details:

- Health and safety policy
- Training records and certificates
- Certificate of Inspection for completed building construction
- Fire-fighting acceptance certificate of production building
- Fire drill records
- Fire equipment maintenance records
- Accident records
- Trained first aiders' certificates
- Electrician operation certificate
- Onsite observation
- Interview with management and workers

Any other comments:

Nil

| | |
|--|--|
| <p>A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: Mrs. Cao Zeying/Plant Manager was responsible for issue of Health & Safety in the factory.</p> |
| <p>B: Are the policies included in workers' manuals?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: Employees' Manual covered the EHS policies.</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: No structural addition was observed. The factory provided building's acceptance certificates for review.</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: Auditor was informed on H&S and provided with personal protective equipment when needed.</p> |
| <p>E: Is a medical room or medical facility provided for workers? 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 local law requirement, while first aid kit was available for each workshop.</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: 3 qualified first aiders were available in the factory.</p> |
| <p>G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> |

| | |
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| competent persons e.g. buses and other vehicles? | G1: Please give details: The factory did not provide worker transport. |
| H: Is secure personal storage space provided for workers in their living space and is fit for purpose? | <input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: N/A, no dormitory was provided by the factory. |
| 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? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No I1: Please give details: EHS risk assessments were conducted regularly with actions implementation. |
| 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: Factory provided EIA report and EIA approval for review. |
| 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: It was acceptable. |

| Non-compliance: | |
|--|--|
| <p>1. 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: Based onsite observation, 2 sewing machines were missing belt pulley safety guard in 3/F stitching workshop.</p> <p>Local law and/or ETI requirement: General Rules of Design on Health and Safety of Production Facility (GB 5083-1999) 6.1.6 Base on the horizontal surface of operator's workplace, all the followings with height less than two meters must be installed with safeguard: exposed dangerous parts and position of transmission belt, axle, transmission chain, coupling, pulley, gear, flywheel, sprocket wheel, electric saw. ETI CODE 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: The factory should install the belt pulley safety guard for all sewing machines.</p> | <p>Objective evidence observed 1: Onsite observation NC Photo No. 1&2</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: Based onsite observation, the water pressure of two eyes washing facility was not enough for use in 2/F & 3/F workshop.</p> <p>Local law and/or ETI requirement:</p> | <p>Objective evidence observed 2: Onsite observation NC Photo No. 3&4</p> |

| | |
|--|--|
| <p>Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 25 For toxic or harmful work sites where acute occupational injuries may occur, an employer shall install alarms and provide on-spot rescue items, washing equipment, emergency evacuation exits, and necessary hazard buffer zones.</p> <p>ETI CODE 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</p> <p>Recommended corrective action: The factory should ensure the water pressure of the two eyes washing facility is enough for use in 2/F & 3/F workshop.</p> | |
|--|--|

| Observation: | |
|---|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good Examples observed: | |
|---|--|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective Evidence Observed: Nil</p> |

4: Child Labour Shall Not Be Used

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

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

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:

- The factory established effective procedure to check the workers' ages during the recruitment.
- On basis of reviewing recruiting instruction, all applicants should write register sheets during recruiting, and all information identified in the register sheets should be verified.
- Once workers have joined their original ID's are copied and given back to them whilst copies only are kept in their personnel file.
- Review of roster and personal files showed that no child labour or young worker (16-18 years old) was identified during the audit. The youngest worker in the factory was 18 years old, who was born on 18 Aug. 2003 and entered the factory on 10 Sept. 2021.
- The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, also did not arrange young workers to hazardous post.
Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour.

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

Details:

1. Recruitment policy
2. Rosters of employees
3. Personnel files with ID copies
4. Workers and management interviews
5. Onsite observation

Any other comments:

Nil

| | |
|----------------------------------|---|
| A: Legal age of employment: | 16 years old |
| B: Age of youngest worker found: | The youngest worker at the factory was 18 years old, who was born on 18 Aug. 2003 and entered the factory on 10 Sept. 2021. |

| | |
|--|--|
| 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) | 0 % |
| 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: N/A, no young worker (16-18 years old) was identified during the audit. |

| 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: Nil Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |

| Observation: | |
|---|--|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| Good Examples observed: | |
|---|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

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:

- Based on provided payroll records and management interview, it was noted all workers were paid by hourly rate.
- The local legal minimum wage was RMB1550/month (RMB8.91 per hour) since 1 July 2018.
- Minimum wage guarantee system was established for all workers. Based on attendance records and payroll records provided by the factory, it was noted workers' minimum wages were paid meeting the local legal requirement, which was at least RMB1550/month (RMB8.91 per hour).
- Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted the factory paid 150% of normal wage rate for weekday overtime and 200% of normal wage rate for weekend overtime, which was in line with legal requirement. No overtime working on statutory holidays, all workers were rest on statutory holidays and factory would pay normal wage to workers for statutory holidays.
- There were total 89 employees in the factory. According to the social insurance payment records of Oct. 2021, it was noted that factory only provided social insurances (retirement insurance, medical, unemployment, accident, and child-bearing insurance) to 6 out of total 89 employees.
Remark: The factory provided the commercial accident insurance to all employees.
- All workers were paid on 30th of following month by cash.
- Each worker was given a pay slip and signed for their wages.
- All workers are 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.

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

Details:

- Document review
- Workers and management interview
- Wages and benefits policy
- Local official minimum wage document
- Payroll records from Sept. 2020 to Aug. 2021
- Attendance records from 1 Sept. 2020 to 11 Oct. 2021
- Leave records and resignation records

| |
|---|
| <ul style="list-style-type: none"> • Payment receipts of social insurance • Labour contracts <p>Any other comments: Nil</p> |
|---|

| Non-compliance: | |
|--|--|
| <p>1. 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:</p> <p>There were total 89 employees in the factory. According to the social insurance purchase records of Oct. 2021, it was noted that factory only provided social insurances (retirement insurance, medical, unemployment, accident, and child-bearing insurance) to 6 out of total 89 employees. Remark: The factory provided the commercial accident insurance to all employees.</p> <p>Local law and/or ETI requirement: Labor Law of the People’s Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.</p> <p>ETI Base Code 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p> <p>Recommended corrective action: The factory should provide 5 kinds of social insurance for all employees as per legal requirement.</p> | <p>Objective evidence observed: Document review, workers and management interview NC Photo No.5</p> |

| Observation: | |
|---|--|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

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| Good Examples observed: | |
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

Summary Information

| Criteria | Local Law <i>(Please state legal requirement)</i> | Actual at the Site <i>(Record site results against the law)</i> | Is this part of a Collective Bargaining Agreement? |
|--|---|--|---|
| A: Standard/Contracted work hours: <i>(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)</i> | Legal minimum: 8 hours per day, 40 hours per week. | A1: 8 hours per day, 40 hours per week. | A2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: Overtime hours: <i>(Maximum legal and actual overtime hours, please state if possible per day, week, and month)</i> | Legal minimum: 3 hours per day and 36 hours per month. | B1: 2 hours/day, 20 hours/week, 84 hours/month in Aug. 2021 (Current month); 2 hours/day, 20 hours/week, 94 hours/month in July 2021 (Random month); 2 hours/day, 20 hours/week, 82 hours/month in Nov. 2020 (Random month). | B2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| C: Wage for standard/contracted hours: <i>(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: The local legal minimum wage was RMB1550/month (RMB8.91 per hour) since 1 July 2018. | C1: At least RMB1550/month (RMB8.91 per hour) | C2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| D: Overtime wage: <i>(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)</i> | Legal minimum: 150% of normal wage rate for weekday overtime; 200% of normal wage | D1: 150% of normal wage rate for weekday overtime; 200% of normal wage | D2: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

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| | rate for weekend overtime; 300% of normal wage rate for statutory holiday overtime. | rate for weekend overtime. No overtime working on statutory holidays. | |
|--|---|---|--|

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? | NA | |
| B: Sample Size Checked <i>(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)</i> | 10 samples from Aug. 2021 (Current month); 10 samples from July 2021 (Random month); 10 samples from Nov. 2020 (Random month). | |
| C: Are there different legal minimum wage grades? If Yes , please specify all. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | C1: If Yes , please give details: |
| D: If there are different legal minimum grades, are all workers graded and paid correctly? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | D1: If No , please give details: |
| E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? | <input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above | E1: Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i> The local legal minimum wage was RMB1550/month (RMB8.91 per hour) since 1 July 2018. Based on attendance records and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted workers' minimum wages were paid at least RMB1550/month (RMB8.91 per hour which meeting the local legal requirement. |
| F: Please indicate the breakdown of workforce per earnings: | F1: ___% of workforce earning under minimum wage F2: <u>100</u> % of workforce earning minimum wage F3: ___% of workforce earning above minimum wage | |
| G: Bonus Scheme found: Please specify details: | 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> Work-position bonus | |
| H: What deductions are required by law e.g. social insurance? | Social insurance and individual income tax. | |

| | | | |
|--|--|---|--|
| Please state all types: | | | |
| I: Have these deductions been made? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | I1: Please list all deductions that have been made. | 1. Social insurance 2. Individual income tax Please describe: |
| | | I2: Please list all deductions that have not been made. | 1. Social insurance 2. Nil Please describe: The factory didn't provide 5 kinds of social insurance for 93% (83 out of total 89) employees. |
| 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: All workers were required to use electronic attendance system to retain attendance records when time in and time out. Workers' attendance records with detailed time in/out were provided for review. | | |
| 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: There was no 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: N/A | | |
| 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 reviewed the wages yearly refer to local bureau opinion etc. and informed workers about salary adjustment. | | |
| O: Are workers paid in a timely manner in line with local law? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |

| | |
|---|---|
| <p>P: Is there evidence that equal rates are being paid for equal work:</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No P1: Please give details: Through factory rules review, payroll records review and employee's interviews' interview, it was confirmed that equal rates are being paid for equal work.</p> |
| <p>Q: How are workers paid:</p> | <p><input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other Q1: If other, please explain:</p> |

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:

- Through employees' interview, overtime is voluntary.
- According to attendance records and worker interview, basic working hours were 8 hours per day and 40 hours per week.
- Electronic attendance system was used to record workers' attendance records.
- Normally workers overtime worked 2 hours on weekdays, and overtime worked 10 hours on Saturdays. Workers were always rest on Sundays.
- Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted all sampled workers' monthly overtime hours exceeded 36 hours, the max monthly overtime hours were 94 hours, which happened in July 2021. All sampled workers' weekly hours were control within 60 hours; the maximum weekly working hours was 60 hours. All workers enjoyed at least one day off per seven days.
- Max overtime hours in samples were as below:
2 hours/day, 20 hours/week, 84 hours/month in Aug. 2021 (Current month);
2 hours/day, 20 hours/week, 94 hours/month in July 2021 (Random month);

2 hours/day, 20 hours/week, 82 hours/month in Nov. 2020 (Random month).

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

Details:

- Worker interview
- Management interview
- Working hour policy
- Attendance records 1 Sept. 2020 to 11 Oct. 2021
- Payroll records from Sept. 2020 to Aug. 2021
- Workers' labour contracts
- Production records

Any other comments:

Nil

Non-compliance:

1. Description of non-compliance:

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

Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted all sampled workers' monthly overtime hours exceeded 36 hours in each month, the max monthly overtime hours were 94 hours, which happened in July 2021.

Local law and/or ETI requirement:

Labor Law of the People's Republic of China (2018 Amendment), Article 41

The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

ETI base code 6.1

Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers.

Sub-clauses 6.2 to 6.6 are based on international labour standards.

Recommended corrective action:

Factory should ensure all workers' monthly overtime hours in line with legal requirement.

Objective evidence observed:

Document review
NC photo No. 6

Observation:

| | |
|---|--|
| Description of observation: Nil | Objective evidence observed: Nil |
| Local law or ETI requirement: Nil | |
| Comments: Nil | |

| Good Examples observed: | |
|--|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

| 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: Finger-print attendance system is used in place. | | | |
| B: Is sample size same as in wages section? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No B1: If no, please give details | | | |
| 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: | | | |
| 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" style="width: 100%; text-align: center;"> <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: NA | <input type="checkbox"/> 0 hrs | <input type="checkbox"/> Part time | <input type="checkbox"/> Variable hrs |
| <input type="checkbox"/> 0 hrs | <input type="checkbox"/> Part time | <input type="checkbox"/> Variable hrs | <input type="checkbox"/> Other | |
| E. Do any standard/contracted working hours defined in contracts/employment | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes , please detail hours, %, types of workers affected and frequency Please give details: | | | |

| | | |
|---|--|--|
| agreements exceed 48 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): |
| | | 6 days |
| 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: N/A |
| 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: N/A |
| Overtime Hours worked | | |
| I: Actual overtime hours worked in sample (State per day/week/month) | Highest OT hours: 2 hours/day, 20 hours/week, 84 hours/month in Aug. 2021 (Current month); 2 hours/day, 20 hours/week, 94 hours/month in July 2021 (Random month); 2 hours/day, 20 hours/week, 82 hours/month in Nov. 2020 (Random month) | |
| J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No No sampled workers' weekly hours exceeded 60 hours; Max. weekly hours were 60 hours. | |
| K: Approximate percentage of total workers on highest overtime hours: | __80__% | |
| L: Is overtime voluntary? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information | L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Based on worker interview, overtime is voluntary. |
| Overtime Premiums | | |

| | | |
|---|---|--|
| <p>M: Are the correct legal overtime premiums paid?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium | <p>M1: Please give details of normal day overtime premium as a % of standard wages: Based on the attendance records from 1 Sept. 2020 to 11 Oct. 2021 and payroll records from Sept. 2020 to Aug. 2021 provided by the factory, it was noted the factory paid 150% of normal wage rate for weekday overtime and 200% of normal wage rate for weekend overtime, which was in line with legal requirement. No overtime working on statutory holidays, all workers were rest on statutory holidays and factory would pay normal wage to workers for statutory holidays.</p> |
| <p>N: Is overtime paid at a premium?</p> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | <p>N1: If yes, please describe % of workers & frequency: 100% of workers were paid for overtime wages as local law together with normal wages, on a month basis.</p> |
| <p>O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.</p> | <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 <input type="checkbox"/> N/A | <p>O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other</p> |
| <p>N/A</p> | <p>N/A</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> | <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) <input type="checkbox"/> NA | <p>P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:</p> |
| <p>NA</p> | <p>NA</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> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <p>Q1: If yes, please give details:</p> | |
| <p>R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is</p> | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |

| | |
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| the exception rather than the rule. | |
|-------------------------------------|--|

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:

- Based on management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc.; female workers and male workers had the same pay and working conditions; promotion was based on workers' ability and skill; training was based on working requirement.
- There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found.
- There was no evidence of sexual harassment.
- The management generally knew the requirement of Non-Discrimination.
- As informed by interviewed workers, most employees spoke highly of the factory owner.

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

Details:

- Non-discrimination Procedure
- The hiring procedure, termination procedure, leave application records and employee handbook.
- Payrolls
- Attendance records
- Termination records
- Training records

Any other comments:
Nil

| | |
|--|--|
| A: Gender breakdown of Management + Supervisors (Include as one combined group) | A1: Male: <u>50</u> % A2: Female <u>50</u> % |
| B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst: | 3 women are in skilled or technical roles e.g. workshop supervisor and QC. |
| C: Is there any evidence of discrimination based on race, caste, | <input type="checkbox"/> Hiring <input type="checkbox"/> Compensation |

| | |
|---|---|
| national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?: | <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 C1: Please give details: No evidence of discrimination was found at the time of audit. |
|---|---|

Professional Development

| | |
|---|--|
| A: What type of training and development are available for workers? | Employee training on EHS, Production & fire safety knowledge, Factory rules, HR policies, Wages & Benefits, Working hours etc. |
|---|--|

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

| 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: Nil Local law and/or ETI requirement: Nil Recommended corrective action: Nil | Objective evidence observed: Nil |

| Observation: | |
|---|--|
| Description of observation: Nil Local law or ETI requirement: Nil Comments: Nil | Objective evidence observed: Nil |

| Good Examples observed: | |
|--|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

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:

- According to workers interview and management interview, workers signed contracts with the factory as local law's requirement.
- All interviewed workers indicated that they were provided with contract copies to know all items included.
- No homework was arranged, and no apprenticeship schemes were practiced in this factory.
- The factory saved all workers' personal files and contracts for review.
- The factory established employment procedure for workers' recruitment.
- No dispatched workers and contractor workers were used in factory. All workers were recruited by factory directly.

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

Details:

- Recruitment procedure
- Personal files and Labour contracts
- Worker and management interview
- Payroll records

Any other comments:

Nil

| Non-compliance: | |
|---|---|
| <p>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: Nil</p> <p>Local law and/or ETI requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Observation: | |
|--|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good Examples observed: | |
|--|---|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective Evidence Observed: Nil</p> |

Responsible Recruitment

| All Workers | |
|---|--|
| <p>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?</p> | <p><input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions</p> <p>A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:</p> |
| <p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>B1: If yes, please describe details and specific category(ies) of workers affected:</p> |

| | |
|----------------------------------|---|
| 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: N/A |
| D: If any checked, give details: | N/A |

| | |
|--|--|
| Migrant Workers: <i>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</i> | |
| A: Type of work undertaken by migrant workers: | Most migrant workers were from other provinces except of Guangdong Province. And migrant workers were arranged at all work position, which same as local. It was acceptable. |
| B: Please give details about recruitment agencies for migrant workers: | B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: 0 |
| 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? | <input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: NA |
| D: Are Any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i> | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, number and example of roles: For example: 2 management roles were migrant workers. |

NON-EMPLOYEE WORKERS

| Recruitment Fees: | |
|----------------------------------|---|
| A: Are there any fees? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| B: 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 NA B1 – If other, please give details: NA |
| C: If any checked, give details: | NA |

| 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: NA |
| B: Were agency workers' age / pay / hours included within the scope of this audit? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |
| C: Were sufficient documents for agency workers available for review? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA |
| D: Is there a legal contract / agreement with all agencies? | <input type="checkbox"/> Yes <input type="checkbox"/> No NA D1: Please give details: |
| E: Does the site have a system for checking labour standards of agencies? | <input type="checkbox"/> Yes <input type="checkbox"/> No |

| | |
|------------------------------|--------------------------------|
| If yes, please give details. | E1: Please give details: NA |
|------------------------------|--------------------------------|

| <p style="text-align: center;">Contractors:</p> <p style="text-align: center;"><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></p> | |
|---|--|
| 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: |
| B: If Yes , how many workers supplied by contractors? | N/A |
| C: Do all contractor workers understand their terms of employment? | <input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please describe finding: N/A |
| D: If Yes , please give evidence for contractor workers being paid per law: | N/A |

8A: Sub-Contracting and Homeworking

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

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

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:

1. Based on onsite observation and management interview, no sub-contractor was used in the factory.
2. No homeworking was identified in the factory.

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

- Site tour (Calculation on total production and estimated capacity)
- Materials in/out records
- Management interview
- Workers interview

Non-compliance:

1. Description of non-compliance:

NC against ETI/Additional Elements

NC against Local Law

NC against customer code:

Nil

Local law and/or ETI /Additional Elements requirement:

Nil

Recommended corrective action:

Nil

Objective evidence

observed:

Nil

Observation:

Description of observation:

Nil

Objective evidence

observed:

| | |
|--|-----|
| Local law or ETI/Additional elements requirement: Nil Comments: Nil | Nil |
|--|-----|

| Good Examples observed: | |
|--|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

| 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? | |

| 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: |
| | | | |

| | |
|--|--|
| <p>D: Is there a site policy on homeworking?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> |
| <p>E: How does the site ensure worker hours and pay meet local laws for homeworkers?</p> | |
| <p>F: What processes are carried out by homeworkers?</p> | |
| <p>G: Do any contracts exist for homeworkers?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:</p> |
| <p>H: Are full records of homeworkers available at the site?</p> | <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> |

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 A1: Please give details: Workers could raise grievances to local government or media, etc.</p> |
| <p>B: If Yes, are workers aware of these channels and have access? Please give details.</p> | <p>It was confirmed by workers' interview.</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>Suggestion box</p> |
| <p>D: Which of the following groups is there a grievance mechanism in place for?</p> | <p><input checked="" type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give details: Workers could raise grievances to worker representatives, supervisors, team leaders, or managers directly.</p> |
| <p>E: Are there any open disputes?</p> | <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details</p> |
| <p>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)</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details</p> |
| <p>G: Is there a published and transparent disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain</p> |
| <p>H: If yes, are workers aware of these the disciplinary procedure?</p> | <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details</p> |

| | |
|--|--|
| <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 II: If yes, please give details</p> |
|--|--|

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:

- No negative evidence of mental / physical coercion was identified during the audit.
- There was no evidence of sexual harassment.
- The workers interviewed said they never witnessed any cases of physical abuse or discipline, sexual or other harassment and verbal abuse or other forms of intimidation existed in this factory.

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

Details:

- Factory rules.
- The duties of security guards were duty to protect safety of factory's property, to regularized entrance/exit of goods/ vehicles/ employees/ visitors.

Any other comments:
 Nil

Non-compliance:

| | |
|---|---|
| <p>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: Nil</p> <p>Local law and/or ETI requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |
|---|---|

Observation:

| | |
|--|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |
|--|---|

| Good Examples observed: | |
|--|--|
| Description of Good Example (GE): Nil | Objective Evidence Observed: Nil |

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:

- Based on document review, management and worker interview, all workers in the factory were Chinese. Migrant workers came from other provinces like Hunani/Sichuan/Henan Province. All workers had the proper legal rights to work in this region. The youngest worker in the factory was 18 years old, who was born on 18 Aug. 2003 and entered the factory on 10 Sept. 2021.
- No labor agency was involved in the factory's recruitment processes.
- Recruitment procedures and employment procedures, the factory had established Recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment.
- No agency staff or foreign worker was used by the factory.
- The factory collected related laws on entitlement to work and immigration.

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

Details:

- Hiring procedure
- Personnel files and labor contracts
- Employee handbook
- Employee roster
- Worker interview and management interview

Any other comments:

Nil

Non-compliance:

| | |
|--|---|
| <p>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: Nil</p> <p>Local law and/or ETI /Additional Elements requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |
|--|---|

| Observation: | |
|--|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI/Additional Elements requirement: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good examples observed: | |
|--|---|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective Evidence Observed: Nil</p> |

10. Other issue areas 10B2: Environment 2–Pillar

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

To be completed for a 2–Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.

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:

- Factory provided EIA report and EIA approval for review.
- The factory learned about the environment impact of their site and took continuously management measures to control the environment impact.
- Based on workers interview, they were trained on environmental protection.
- The factory management maintained most legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations.
- The factory had procedure on environment protection, and Mrs. Cao Zeying/Plant Manager was appointed to response the compliance of environment requirement.

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

Details:

- Environmental policy and procedure
- All legally required environmental documents were provided for review
- Worker and management interview
- Site tour
- EIA report and EIA approval
- Hazardous wastes transfer records

Any other comments:

Nil

Non-compliance:

| | |
|---|--|
| <p>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: Nil</p> <p>Local law and/or ETI/Additional Elements requirement: Nil</p> <p>Recommended corrective action: Nil</p> | <p>Objective evidence observed: Nil</p> |
|---|--|

| Observation: | |
|---|---|
| <p>Description of observation: Nil</p> <p>Local law or ETI/Additional elements requirements: Nil</p> <p>Comments: Nil</p> | <p>Objective evidence observed: Nil</p> |

| Good examples observed: | |
|--|---|
| <p>Description of Good Example (GE): Nil</p> | <p>Objective Evidence Observed: Nil</p> |

Other findings

| Other Findings Outside the Scope of the Code |
|--|
| Nil |

| 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> |
|---|
| Nil |

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

Non-compliance Photos:

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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|  |  |  | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>No. 1: The sewing machine was missing belt pulley safety guard in 3/F stitching workshop</p> | <p>No. 2: The sewing machine was missing belt pulley safety guard in 3/F stitching workshop</p> | <p>No. 3: The water pressure of eyes washing facility was not enough for use in 2/F workshop.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|  |  | <table border="1"> <tr><td>2021/7/1</td><td>8:25</td><td>12:00</td><td>12:10</td><td>18:11</td><td>18:20</td><td>21:41</td><td>0</td><td>2</td></tr> <tr><td>2021/7/2</td><td>8:28</td><td>12:02</td><td>12:10</td><td>18:10</td><td>18:20</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/3</td><td>8:18</td><td>12:06</td><td>12:16</td><td>18:05</td><td>18:25</td><td>21:35</td><td>8</td><td>2</td></tr> <tr><td>2021/7/4</td><td></td><td></td><td></td><td></td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>2021/7/5</td><td>8:31</td><td>12:01</td><td>12:10</td><td>18:13</td><td>18:30</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/6</td><td>8:39</td><td>12:09</td><td>12:10</td><td>18:10</td><td>18:20</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/7</td><td>8:18</td><td>12:06</td><td>12:16</td><td>18:05</td><td>18:25</td><td>21:35</td><td>8</td><td>2</td></tr> 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<tr><td>2021/7/22</td><td>8:19</td><td>12:04</td><td>12:14</td><td>18:03</td><td>18:20</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/23</td><td>8:28</td><td>12:06</td><td>12:12</td><td>18:11</td><td>18:20</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/24</td><td>8:18</td><td>12:06</td><td>12:16</td><td>18:04</td><td>18:20</td><td>21:35</td><td>0</td><td>10</td></tr> <tr><td>2021/7/25</td><td></td><td></td><td></td><td></td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>2021/7/26</td><td>8:21</td><td>12:12</td><td>12:12</td><td>18:05</td><td>18:20</td><td>21:41</td><td>0</td><td>2</td></tr> <tr><td>2021/7/27</td><td>8:28</td><td>12:02</td><td>12:12</td><td>18:05</td><td>18:20</td><td>21:32</td><td>0</td><td>2</td></tr> <tr><td>2021/7/28</td><td>8:18</td><td>12:06</td><td>12:16</td><td>18:05</td><td>18:20</td><td>21:35</td><td>0</td><td>2</td></tr> <tr><td>2021/7/29</td><td>8:17</td><td>12:06</td><td>12:16</td><td>18:11</td><td>18:31</td><td>21:33</td><td>0</td><td>2</td></tr> <tr><td>2021/7/30</td><td>8:21</td><td>12:07</td><td>12:10</td><td>18:13</td><td>18:34</td><td>21:41</td><td>0</td><td>2</td></tr> <tr><td>2021/7/31</td><td>8:28</td><td>12:12</td><td>12:14</td><td>18:05</td><td>18:20</td><td>21:32</td><td>0</td><td>10</td></tr> </table> | 2021/7/1 | 8:25 | 12:00 | 12:10 | 18:11 | 18:20 | 21:41 | 0 | 2 | 2021/7/2 | 8:28 | 12:02 | 12:10 | 18:10 | 18:20 | 21:32 | 0 | 2 | 2021/7/3 | 8:18 | 12:06 | 12:16 | 18:05 | 18:25 | 21:35 | 8 | 2 | 2021/7/4 | | | | | | | 0 | 0 | 2021/7/5 | 8:31 | 12:01 | 12:10 | 18:13 | 18:30 | 21:32 | 0 | 2 | 2021/7/6 | 8:39 | 12:09 | 12:10 | 18:10 | 18:20 | 21:32 | 0 | 2 | 2021/7/7 | 8:18 | 12:06 | 12:16 | 18:05 | 18:25 | 21:35 | 8 | 2 | 2021/7/8 | 8:38 | 12:06 | 12:12 | 18:08 | 18:33 | 21:34 | 0 | 2 | 2021/7/9 | 8:14 | 12:01 | 12:10 | 18:08 | 18:20 | 21:32 | 0 | 2 | 2021/7/10 | 8:28 | 12:02 | 12:12 | 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12:12 | 18:05 | 18:20 | 21:41 | 0 | 2 | 2021/7/27 | 8:28 | 12:02 | 12:12 | 18:05 | 18:20 | 21:32 | 0 | 2 | 2021/7/28 | 8:18 | 12:06 | 12:16 | 18:05 | 18:20 | 21:35 | 0 | 2 | 2021/7/29 | 8:17 | 12:06 | 12:16 | 18:11 | 18:31 | 21:33 | 0 | 2 | 2021/7/30 | 8:21 | 12:07 | 12:10 | 18:13 | 18:34 | 21:41 | 0 | 2 | 2021/7/31 | 8:28 | 12:12 | 12:14 | 18:05 | 18:20 | 21:32 | 0 | 10 |
| 2021/7/1 | 8:25 | 12:00 | 12:10 | 18:11 | 18:20 | 21:41 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/2 | 8:28 | 12:02 | 12:10 | 18:10 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/3 | 8:18 | 12:06 | 12:16 | 18:05 | 18:25 | 21:35 | 8 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/4 | | | | | | | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/5 | 8:31 | 12:01 | 12:10 | 18:13 | 18:30 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 2021/7/7 | 8:18 | 12:06 | 12:16 | 18:05 | 18:25 | 21:35 | 8 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/8 | 8:38 | 12:06 | 12:12 | 18:08 | 18:33 | 21:34 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/9 | 8:14 | 12:01 | 12:10 | 18:08 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 2021/7/11 | | | | | | | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/12 | 8:19 | 12:04 | 12:14 | 18:03 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/13 | 8:38 | 12:10 | 12:14 | 18:07 | 18:32 | 21:39 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/14 | 8:21 | 12:11 | 12:14 | 18:11 | 18:20 | 21:39 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/15 | 8:28 | 12:05 | 12:12 | 18:01 | 18:25 | 21:35 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/16 | 8:19 | 12:07 | 12:12 | 18:04 | 18:20 | 21:35 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/17 | 8:19 | 12:04 | 12:12 | 18:04 | 18:20 | 21:41 | 0 | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/18 | 8:18 | 12:06 | 12:11 | 18:11 | 18:31 | 21:31 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/19 | 8:14 | 12:01 | 12:10 | 18:08 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/20 | 8:28 | 12:02 | 12:12 | 18:05 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/21 | 8:18 | 12:06 | 12:16 | 18:05 | 18:25 | 21:35 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/22 | 8:19 | 12:04 | 12:14 | 18:03 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/23 | 8:28 | 12:06 | 12:12 | 18:11 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/24 | 8:18 | 12:06 | 12:16 | 18:04 | 18:20 | 21:35 | 0 | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/25 | | | | | | | 0 | 0 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/26 | 8:21 | 12:12 | 12:12 | 18:05 | 18:20 | 21:41 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/27 | 8:28 | 12:02 | 12:12 | 18:05 | 18:20 | 21:32 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/28 | 8:18 | 12:06 | 12:16 | 18:05 | 18:20 | 21:35 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/29 | 8:17 | 12:06 | 12:16 | 18:11 | 18:31 | 21:33 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/30 | 8:21 | 12:07 | 12:10 | 18:13 | 18:34 | 21:41 | 0 | 2 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2021/7/31 | 8:28 | 12:12 | 12:14 | 18:05 | 18:20 | 21:32 | 0 | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <p>No. 4: The water pressure of eyes washing facility was not enough for use in 3/F workshop.</p> | <p>No. 5: According to the social insurances' payment record of Oct. 2021, it was noted that factory only provided social insurances (retirement insurance, medical, unemployment, accident, and child-bearing insurance) to 6 out of total 89 employees.</p> | <p>No. 6: All sampled workers' monthly overtime hours exceeded 36 hours in each month, the max monthly overtime hours were 94 hours, which happened in July 2021.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

OB Photos:

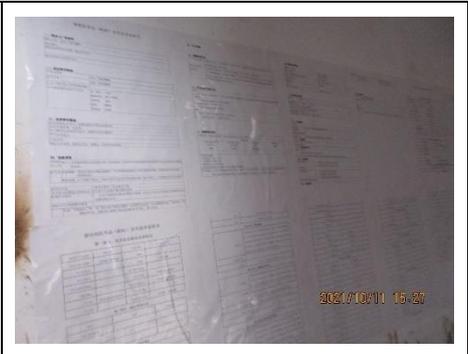
| | | |
|------------|------------|------------|
| <p>Nil</p> | <p>Nil</p> | <p>Nil</p> |
|------------|------------|------------|

Best Practice Photos:

| | | |
|-----|-----|-----|
| Nil | Nil | Nil |
| | | |

General Site Tour Photos:

| | | |
|------------------------|----------------------|--------------------------|
| | | |
| Factory gate | Factory name and GPS | Production building |
| | | |
| Raw material warehouse | Cutting | Stitching |
| | | |
| Lasting | Inspection & Package | Finished goods warehouse |

| | | |
|--|--|---|
|  |  |  |
| <p>Fire extinguishers</p> | <p>First aid kit</p> | <p>Electric box with warning sign</p> |
|  |  |  |
| <p>Exit sign and emergency light</p> | <p>Fire hydrant and alarm</p> | <p>Toilet</p> |
|  |  |  |
| <p>PPE reminder sign</p> | <p>Gluing workers wore the active carbon masks during operation</p> | <p>Cutting workers wore Earplugs and mask during operation</p> |
|  |  |  |

| | | |
|------------------------|-------------|--------------------------------------|
| Chemicals storage area | MSDS posted | Chemicals container with safety sign |
|------------------------|-------------|--------------------------------------|



| | | |
|----------------|----------------|---------------------|
| Suggestion box | Drinking water | Attendance recorder |
|----------------|----------------|---------------------|



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](#)

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

[Click here for Supplier \(B\) members:](#)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](#)

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