



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC422148868	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS422148870	
Business name (Company name):	Dongguan Winkey Technology Company Limited			
Site name:	Dongguan Winkey Technology Company Limited			
Site address:	Room 501, Building 6, No.19, Alishan Road, Songshan Lake High-Tech Industrial Development Zone, Dongguan, Guangdong, China. Dongguan 523808 CN	Country:	CN	
Site contact and job title:	Ms. Luo Meng Huo / Quality Manager			
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2022-12-29			

Audit Company Name:
Intertek Shenzhen

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

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Sky Zhou	APSCA Number:	21700339
Additional Auditors:			
Date of declaration:	2022-12-29		

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

Site Representation	
Full Name:	Ms. Luo Meng Huo
Title:	Quality Manager
Date of declaration:	2022-12-29
Comments:	

Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic			0	0	0	
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive	6.1	§1	1	0	0	NC - ZAF600003289
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

Site Details

Site Details		
Company Name	Dongguan Winkey Technology Company Limited	
Site Name	Dongguan Winkey Technology Company Limited	
GPS location (if available)	GPS Address:	Room 501, Building 6, No.19, Alishan Road, Songshan Lake High-Tech Industrial Development Zone, Dongguan City, Guangdong Province, China
	Coordinates:	Latitude: N 23°53'1.04"; Longitude: E 113°53'3.33"
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License Number: 91441900MA52BQE32C	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Cosmetic ingredients	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p>Dongguan Winkey Technology Co., Ltd. was located at Room 501, Building 6, No.19, Alishan Road, Songshan Lake High-Tech Industrial Development Zone, Dongguan City, Guangdong Province, China. The total floor area occupied by the facility was about 1,879 square meters and land area was about 1,879 square meters. They started their operation at the existing location since October 2018. A total of 29 employees were currently working in the facility, which included 4 management staff and 25 non-management employees. 19 employees were production employees and 10 employees were non-production employees. There were 7 local employees and 22 domestic migrant employees in the facility. The migrant employees are from Guangxi, Hunan, Hubei and Henan provinces of China. The youngest employee found was 20 years old in the facility. All employees were directly recruited by facility. Normal work hours of all employees were 8 hours per day, 40 hours per week from Monday to Friday. All employees worked in one shift from 8:00-12:00, 13:30-17:30. Facial ID attendance system was used for time keeping for employees. Every employee should scan their face when they go in or out of the workshop. Employees' wages were calculated on hourly basics and paid monthly on or before 15th each month by cash. The peak season of the facility was not obvious as per facility management interview. In view of the facilities, the facility rented 5F of one 5-storey production building as production floors, warehouse and office from the industrial park. No information of the facilities on this 5-storey production building was provided by the industrial park due to confidential reason. Based on the facility tour and employees' interview, the audit facility operated independently, no comingle was noted. No dormitory, kitchen or canteen was available in the facility.</p>	

Structure and number of buildings	Building Name:		Production building
	Floor	Description	Remark
	1F-4F	Other facility	Year of establishment: 2015
	5F	Audit facility (Purifying, concentrating, drying, warehouse, lab and office)	Year of establishment: 2015
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No crack was observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Structural evaluation reports for all buildings were provided for review.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season	Select a month to Select a month		
Process overview	The main product manufactured by the facility were cosmetic ingredients. The main production processes were listed as follows: Purifying, concentrating, drying The main machine list of the facility was as following: 2 Purifying machines, 7 concentrating machines, 2 drying machines., etc.		
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None		
Please give details:	One worker committee was established in the facility.		
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:		
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No dormitory was provided by the facility.		

Audit Parameters		
Time in and time out	Day 1	
	In	09:30
	Out	17:30
Audit type:	Full initial	
Was the audit announced?	ANNOUNCED	
Was the Sedex SAQ available for review?	Yes	
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No	
Who signed and agreed CAPR	Ms. Luo Meng Huo / Quality Manager	
Is further information available	No	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no union in the facility.		
Reason for absence during the audit	There was no union in the facility.		
Reason for absence at the closing meeting	There was no union in the facility.		

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	4	0	0	14	0	0	0	18
Worker numbers – female	3	0	0	4	0	0	0	7
Total	7	0	0	18	0	0	0	25
Number of Workers interviewed – male	1	0	0	5	0	0	0	6
Number of Workers interviewed – female	0	0	0	4	0	0	0	4
Total – interviewed sample size	1	0	0	9	0	0	0	10

Nationalities Structure	
Nationality of Management	Chinese
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Chinese approx %: 100%
Was this list completed during peak season?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The peak month was not obvious in the facility.
Worker remuneration	Workers on piece rate: 0%
	Paid hourly: 100%
	Salaried: 0%
Payment cycle	Paid daily: 0%
	Paid weekly: 0%
	Paid monthly: 100%
	Other: 0%
	Details for other: Not applicable

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

Attitude of workers:

6 employees were selected for individually interviewed and total 4 employees in 1 group were selected for group interview. The employees were assured of confidentiality, and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility. All employees said they were satisfied with their employment at the facility and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They 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 but also felt free to give their general concerns, such as working environment to their worker representative who would take it to the worker management committee.

Attitude of worker's committee/union reps:

One worker representative was interviewed. The interviewed worker representative was favourable with the management and the working conditions, and he stated that the worker representatives could give suggestions on all parts of the site's practices, and the facility management would investigate their suggestions or concerns and respond to them in a timely manner.

Attitude of managers:

The management was cooperative throughout the process of the audit. The facility gave full access to all necessary for tour and provided private room for auditor conducting employees' interview. Records required by auditor were provided for review without any restriction. In the closing meeting, the management appeared receptive to the current findings and did not raise any negative feedback.

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

0A: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had a policy, endorsed at the highest level, covering human rights impacts and issues, and it was communicated to all appropriate parties, including its own suppliers.
- The facility had a designated person Ms. Luo Meng Huo/Quality Manager to responsible for implementing standards concerning Human rights.
- The facility had identified their stakeholders and salient issues.
- The facility measured their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- Where businesses have an adverse impact on human rights within any of their stakeholders, they address these issues and enable effective remediation.
- The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

Evidence examined:

- Employee Handbook was reviewed. It stipulated complying with ETI Code, written policies and procedure that being provided individually to employees.
- Company Manual contained details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

The policy expressed that human rights would be respected by the facility.

Does the business have a designated person responsible for implementing standards concerning Human Rights?

☒ Yes ☐ No

Please give details:

Ms. Luo Meng Huo/Quality Manager

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: An anonymous report system was established, such as suggestion box. The reporter's personal information would not be revealed, and the reporting practice would never affect the working arrangement or promotion/position.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had the policy and procedure for safeguarding workers' confidential and private data and information. Workers' confidential and private data and information were kept in lockers of the office. The workers' confidential and private information and data in computers were also controlled and accessed only to authorized person.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 5% This year 5%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	3%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0% This year 0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)	0%
Are accidents recorded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No accidents in past two years.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0% This year 0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0%
Lost day work cases per 100 workers((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	<div>Last year 0%</div> <div>This year 0%</div>
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	<div>6 month 0%</div> <div>12 month 0%</div>
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	<div>6 month 0%</div> <div>12 month 0%</div>

0B - Management Systems and code Implementation

[Summary of Findings]

0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees.

0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined

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

Current Systems:

1. Responsibility for meeting the legal and client code requirements is shared between the Administration Supervisor and the HR Supervisor. Together they are responsible to the Sales Manager for ensuring the standards are met.

2. One senior management (Ms. Luo Meng Huo/Quality Manager) is responsible for compliance with the Code.

3. Implementation of any necessary changes was then given to the individual department heads after agreement with general manager, this system was effective.

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

Evidence examined:

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

2. Appointment letters for compliance responsible persons.

3. Training records.

4. Management interview and employee interview

Any other comments:

None

Management Systems

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

☐ Yes ☒ No

Please give details:

N/A, no any fine/prosecution in past year.

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

☒ Yes ☐ No

Please give details:

The facility had established the policies and procedures for forced labour, child labour and discrimination, harassment and abuse. The written CSR manual was provided for review.

If Yes, is there evidence (an indication) of effective implementation? Please give details.

The facility had provided relevant trainings for employees.

Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provided regular trainings about the standards for forced labour, child labour, discrimination, harassment and abuse for both management and workers.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Regular training records were provided for review and the employees were aware clearly of the facility's relevant policies and procedures according to the interviews.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: 1. certification of ISO9001:2015, the certification No. is 18722Q1173R15, which valid from 24th October 2022 to 23rd October 2025; 2. certification of ISO14001:2015, the certification No. is 18722E1377R05, which valid from 6th December 2022 to 5th December 2025.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility had Human Resources department which in charge of the recruitment of employees, assignment of employees' post, etc. The Ms. Chen Nian Hua was appointed as HR Supervisor.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Ms. Luo Meng Huo/Quality Manager was assigned to responsible for implementation of the Code.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility established and implemented the policy and procedure for safeguarding workers' confidential and private data and information.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employees' personal information would be kept and only accessed by authorized staff, such as HR officer.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessment was conducted regularly by the factory to evaluate the effectiveness of the policy and procedure for safeguarding workers' confidential and private data and information.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The risk procedure had been established and the correction action plan had been established according to assessment report.

Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had its supplier filter program to ensure all suppliers in compliance with legal requirements regarding labour standards.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had the valid land using permit and the property ownership certificate of the facility building. The facility had provided the lease contract of floors of the building for review.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no such national law requirement.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. The land in China mainland was belonged to the nation. Anybody or facility, no matter the character, could only rent the land from governmental department for a period. If the facility would like to use the land, it should apply for it from governmental department. The governmental department would make decision on whether to provide the approval.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: This was conducted by the local governmental authority and the owner purchased the lease according to legal channels, overseen by company legal advisors
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not applicable, the factory did not have plan of land acquisition.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no illegal appropriation of land for facility building or expansion of footprint.

1 - Freely chosen Employment

[Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility has a written policy of prohibiting forced, bonded and prison labor. The policy states that the facility does not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; the facility prohibits forced, bonded or involuntary prison labour; and employees are free to leave their employer after reasonable notice, etc.

2. There was a written recruitment procedure which states that employees must present their ID cards for proof of age but only copies must be kept in the personnel files and the original ID cards will be given back to the employees.

3. The employee handbook was provided to all employees on joining, states that employees are free to leave with 3 days' prior written notice within their probation period and can resign with one month's prior written notice after the probation period; the employees will be given their full wages on their last day of work; the employees are free to leave the workplace outside of their working hours; the overtime is voluntary, etc.

4. The responsibilities of security guards are only protecting the safety of the facility's employees and properties, and security guards are not allowed to abuse employees and conduct body search.

Evidence examined:

1. The facility's hiring procedure was reviewed. The policy includes the following clause: the facility does not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; there is no forced, bonded or involuntary prison labour; and employees are free to leave their employer after reasonable notice.

2. Employment contracts were reviewed, and they contain the notice periods.

3. Management interview and employee interview

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Are there any restrictions on workers' freedom to terminate employment?

☐ Yes ☒ No

Please give details:

There was no restriction on workers' freedom to terminate employment. Workers were free to leave with 3 days' prior written notice within their probation period and can resign with one month's prior written notice after the probation period.

<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>Not applicable (the facility was not UK based or registered or turnover was less than 36m+, so modern day slavery statement was not required for the audited facility).</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Not applicable. There was not any restriction on workers' freedoms to leave the site at the end of the work day. According to the onsite observation and worker interviews, the workers were free to leave the workplace after their working hours every day.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>According to the management interviews, the facility management understood the risks of forced / trafficked / bonded labour in its supply chain; and there was no forced / trafficked / bonded labour in its supply chain currently.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>In order to reduce the risk of forced or trafficked labour in its supply chain, the factory had established and implemented the anti-forced or trafficked labour policy and procedure, provided the relevant trainings to the management and employees, communicated anti forced or trafficked labour policy and procedure to its suppliers, conducted the internal social compliance audit and management review annually, and monitored the social compliance performance of its suppliers annually, etc. There was no forced / trafficked / bonded labour in its supply chain currently.</p>

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

[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility has a written policy of freedom of association and right to collective bargaining. The policy states that the workers are free to form or join trade union or workers' organisation and enjoy the right to collective bargaining, and nobody will be treated differently if they are members of the trade union or workers' organisation, etc.
2. The facility has a written policy about suggestions and appeals, which states that workers can raise their concerns or appeals through worker representatives, suggestion box and their team leaders or above.
3. Worker committee existed in the facility. The worker representatives were selected by the workers. The facility management conducted regular meetings with the worker representatives to discuss and solve the appeals or concerns from the employees. The meeting records were available for review.
4. The interviewed worker representative confirmed that the facility did not interfere in their activities and did not discriminate the worker representatives.

Evidence examined:

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

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	One worker committee was established in the facility.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
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 Please give details: Through telephone, suggestion box, and the facility management, etc	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provided the meeting room, paper and pens for the regular meetings of the committee representatives.
Name of union and union representative, if applicable:	NA, no union was established in the facility.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Yes, one worker committee was established in the facility.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Mr. Cai Jian Hua and Ms. Feng Ya Nan
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2022-03-16
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	There was a worker committee with 2 worker representatives in the facility. The worker representatives conducted meetings quarterly (the latest meeting: 1 December 2022). It took 1 hour to discuss the environmental, health and safety issues, wages, etc. in the latest meeting. The meeting minutes were posted on the notice boards.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

3 - Working Conditions are Safe and Hygienic

[Summary of Findings]

3: Compliance Requirements

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. General Health and Safety management

- Ms. Luo Meng Huo/Quality Manager was appointed as Health & Safety Supervisor for the site.
- Potable water was freely available in all areas and the valid testing report was provided for review.
- Sufficient clean toilets segregated by gender were available at all times to employees
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings showed that there were monthly meetings between the H&S committee (workers) and the H&S manager, and each point is acted on.

2. Fire Safety

- There were at least 2 exits from each work area and these were clearly marked.
- Firefighting equipment was adequate and checks were up-to-date.
- Evacuation diagrams were posted in all areas and understood by all employees interviewed.
- Fire drills were organized and recorded every 6 months of each unit.

3. Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- There was 1 competent electrician at the site and the qualification certificate was valid.
- Electrical wires were compliant with legal requirement.

4. Medical services

- There were adequate first aid kits in each production area and they were well stocked.
- There were 4 first aiders and when a selection was interviewed, they confirmed they had been trained at a local hospital. These first aiders were identified by the photo posters in the production workshop.

5. Chemical Safety

- MSDS for chemical were posted onsite
- Eye washing station was provided for site with chemical.
- Secondary container was provided for chemicals.
- Proper label was provided for chemicals.
- Employees contacted with chemical had properly wear PPE.

6. Machine Safety

- Regular inspection report for cargo lifts were available for review,
- Safety management certificate and operation certificate for the special appliance were available for review.
- Production machines were maintained and inspected timely.

Evidence examined:

<ul style="list-style-type: none"> - Health and safety policy - Health and safety manual - Health and safety committee minutes - Training records and certificates - Fire equipment maintenance records - Fire drill records - Government licenses and checks on air quality and noise level - Building structure safety certificate - Trained first aider record - Accident reports - Interviews with H&S manager - Interviews with employees and H&S committee members
Any other comments:
None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had established general Health & Safety and occupational Health & Safety policies and procedures, and employees would be given relevant training on their entry date.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Employees' manual including facility's general Health & Safety and occupational Health & Safety policies and procedures and detailed requirements.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No change for the building
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All visitors would be introduced with H&S and provided with personal protective equipment if necessary.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No medical room or medical facility provided and no such legal requirement.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: 4 employees were trained on first aid.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility did not provide transportation.

Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No dormitory was provided to employees.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provided lunch break to workers, also if employees need to overtime on regular working days, the employees will take the supper before they started to work.
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 Please give details: The facility met its legal obligations on environmental requirements and provided the environment related certificates, reports and records for review.
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 Please give details: The audited facility met its customer requirements on environmental standards including not using of banned chemicals. The facility had a responsible person who studied and collected the latest environmental and chemical requirements (e.g. banned chemical list) from the authorities both the end clients located countries and the facility located country (i.e. China) and from the end clients regularly through communicating with end clients or internet, then provided the trainings to all workers and implemented the updated & strictest environmental and chemical standards in the facility. The facility had conducted regular internal inspections and audits against the updated & strictest environmental and chemical requirements and standards, if any violation about environment or chemical was found, the facility would analysis the root cause, take corrective and preventive actions accordingly.

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

4: Compliance Requirements

- 4.1 There shall be no new recruitment of child labour.
4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current Systems:

1. There was a written recruitment procedure which states that employees must present their ID cards for proof of age but only copies must be kept in the personnel files and the original ID cards will be given back to the employees; and the facility will never employ and use any child labour under the age of 16 years old.
2. There was juvenile worker and pregnant worker protection procedure; there was no juvenile worker or pregnant worker in the facility.
3. The written employee roster was available.
4. The employees' personnel files include recruitment date, a bio-data sheet, a recent photo and the age documentation (i.e. copy of the ID card). The ID card copy lists the employee's name, household address and the date of birth. The employees' personnel files showed that the youngest employee was 20 years old.
5. Management interview and employee interviews showed that the facility verified all employees' original ID cards at the time of recruitment and kept the photocopies of employee' ID cards in the personnel files, and the facility would not recruit the applicant under the age of 16 years old.

Evidence examined:

1. Recruitment procedure
2. Juvenile worker and pregnant worker protection procedure
3. Employee roster
4. Personnel files
5. Management interview and worker interview

Any other comments:

None

Legal age of employment:	16
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No child labor or young worker was found during this audit.

5 - Living Wages are Paid

[Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Wage & benefit policy and controlling procedure were established and implemented.
2. Wage & benefit policy and controlling procedure were communicated to the employees through regular trainings.
3. The legal minimum wages was set at RMB 1900 per month, which is equivalent to RMB10.92 (1900/21.75/8) per hour after 1st December 2021.
4. Adequate wages and attendance records were kept in the facility.
5. Based on the payroll records, employees' wages were calculated on hourly rate. The minimum wage paid by the facility met the local legal minimum wages.
6. Per the facility's wage & benefit policy, the overtime hours were paid at the rates of 150% and 200% of the normal wages were provided for the overtime hours on weekdays and rest days respectively in the sampled months (there was no overtime in statutory holidays in the sampled months), which met the legal requirement.
8. All employees 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.
9. Sufficient social insurance was provided for employees.
10. Benefits such as annual leave was provided to relevant employees adequately. Moreover, the facility had established written policy of sick leave, marriage leave, and child-bearing leave, but no case was found.
11. All employees were paid at about 15th of each month by cash and each employee was given a pay slip and signed for their wages.
12. No monetary fine was used by the factory as disciplinary measure.

Evidence examined:

1. Wage & benefit policy and controlling procedure
2. Training records about wage and benefit policy and controlling procedure
3. Local legal minimum wage documents
4. Labour contracts for all employees (to examine agreed wage rates)
5. Payroll records from December 2021 to November 2022 and attendance records from 1st December 2021 to 29th December 2022 (audit day) were available for review. Randomly sampled 10 employees' payrolls and attendance records from November 2022 (current month), July 2022 (random month) and January 2022 (random month) for further checking on status of wages and working hours.
6. Social insurance and payment receipts from the local authority
7. Leave records
8. Resignation records
9. Pay slips of all interviewed employees
10. Disciplinary policy and records
11. Production records such as daily production quantity records, QC inspection records, Picking List, disinfection record and material issuing / return records were reviewed
12. Employee interview and management interview.

Any other comments:

None

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 176.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 18.0 Per Month: 82.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 1900.0	Actual Per Day: 87.36 Per Week: 436.8 Per Month: 1900.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples from November 2022 (current month); 10 samples from July 2022 (randomly selected month); 10 samples from January 2022 (randomly selected month);		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.			
Please indicate the breakdown of workforce per earnings	0% of workforce earning under minimum wage 100% of workforce earning minimum wage 0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Allowance and performance bonus were provided for different workstations. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance: basic endowment, unemployment, maternity, basic medical and employment injury. Accommodation expenses, board expenses, personal income tax.		

Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	social insurance was deducted
Please list all deductions that have not been made.	None
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The attendance records reflected all time worked including the normal working hours and the overtime hours. The meetings were arranged during the time of work shift, the time for meetings was regarded as working time and paid legally.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility conducted internal audit annually to check the compliance of wage. And in any event wages should always be enough to meet basic needs and to provide some discretionary income.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through document review and employees' interview, it was noted that equal rate was being paid for equal work.
How are workers paid:	<input checked="" type="checkbox"/> Cash <input type="checkbox"/> Cheque <input type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

6 - Working Hours are not Excessive

[Summary of Findings]

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Working time policy and controlling procedure were established and implemented.
- Voluntary overtime policy was available and overtime was voluntary.
- Working time policy and controlling procedure were communicated to the workers through regular trainings.
- Working time was recorded, kept and provided for reviewing.
- The workers' attendances were recorded by face scan attendance system and the shift start time and shift end time were recorded accordingly.
- Based on the provided attendance records and payrolls as well as worker interviews, standard normal working hours were 8 hours per day and 40 hours per week; at least 1 day off in a week was assured; the monthly overtime working time 64-82 hours.
- As per management interview due to tight schedule, the monthly overtime hours exceeded legal requirement.
- No inconsistency regarding the workers' wages and working time was found between the payrolls, the attendance records, the production related records and worker interviews, etc.

Evidence examined:

- Employee interview
 - Management interview
 - Facility policy on working hours
 - Finger printing attendance system
 - Employees contracts
 - Attendance records from 1st December 2021 to 29th December 2022 (audit day)
- Production records such as daily production record, inspection record, material in/out records

Any other comments:

None

Working hours' analysis

Systems & Processes

What timekeeping systems are used?

Face scan

Is sample size same as in wages section?

☒ Yes ☐ No

Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day, 18 hours per week and 76 hours per month in November 2022 (current month); 2 hours per day, 18 hours per week and 82 hours per month in July 2022 (randomly selected month); 2 hours per day, 18 hours per week and 66 hours per month in January 2022 (randomly selected month).
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The weekly working hours were no more than 60 hours.
Approximate percentage of total workers on highest overtime hours:	80%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information Please give details: The voluntary overtime policy was provided for review. Regular trainings were provided for employees. Through employees' interview and documentation review, it was confirmed that overtime was voluntary.
Overtime premium	

Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium Please give details: 150% of standard wage rate for weekday overtime, 200% of standard wage rate for weekend overtime, no statutory holiday work was conducted by employees.
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 100% employees were paid legal premium rate monthly.
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements <input checked="" type="checkbox"/> Other
Please give details	Not applicable. Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, 150%, 200% and 300% of the normal wages were provided for the overtime hours on weekdays, rest days and statutory holidays respectively in the sampled months for 100% workers.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify)
Please give details	Not applicable (the weekly working hours were no more than 60 hours)
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	Not applicable (the weekly working hours were no more than 60 hours). The voluntary overtime policy was provided for review. Regular trainings on voluntary overtime policy were provided for all workers. Through worker interview and documentation review, it was confirmed that overtime was voluntary. The workers can refuse the overtime arrangement without any punishment or negative impact.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The facility management said overtime hours were caused by labour shortages and tight delivery date of the purchase orders, etc.
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Non-Compliance		Evidence																											
[Back to findings summary]																													
<table border="1"> <thead> <tr> <th colspan="2">Non-Compliance</th> </tr> </thead> <tbody> <tr> <td>Reference</td> <td>ZAF600003289</td> </tr> <tr> <td>Clause</td> <td>6 - Working Hours are not Excessive</td> </tr> <tr> <td>Issue Title</td> <td>480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive</td> </tr> <tr> <td>Subcategory</td> <td>Overtime</td> </tr> <tr> <td>New or carried over?</td> <td> <input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over </td> </tr> <tr> <td>Root cause</td> <td> <input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other </td> </tr> <tr> <td>Root cause - Other</td> <td></td> </tr> <tr> <td>ETI code or local law issue</td> <td>In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</td> </tr> <tr> <td>Explanation to the non compliance</td> <td>Overtime hours exceeded the legal requirement. Through document review, auditor found that: 1. in November 2022 (current month), the monthly overtime hours for 10 out of 10 employees were 76 hours. 2. in July 2022 (random month), the monthly overtime hours for 10 out of 10 employees were 82 hours. 3. in January 2022 (random month), the monthly overtime hours for 10 out of 10 employees were 64-66 hours. 加班时间超过法规要求。通过文件审核，审核员发现在抽取的2022年11月份（当前月）的考勤中，10名随机抽取的员工中10人的月加班时间为76小时；2022年7月份（随机月）的考勤中，10名随机抽取的员工中10人的月加班时间为82小时；2022年1月份（随机月）的考勤中，10名随机抽取的员工中10人的月加班时间为64-66小时。</td> </tr> <tr> <td>Follow up method</td> <td> <input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit </td> </tr> <tr> <td>Timescale</td> <td> <input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other </td> </tr> <tr> <td>Actions</td> <td>It was recommended that the facility should reduce the overtime hours to ensure it is within 36 hours per month.</td> </tr> </tbody> </table>			Non-Compliance		Reference	ZAF600003289	Clause	6 - Working Hours are not Excessive	Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive	Subcategory	Overtime	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		ETI code or local law issue	In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.	Explanation to the non compliance	Overtime hours exceeded the legal requirement. Through document review, auditor found that: 1. in November 2022 (current month), the monthly overtime hours for 10 out of 10 employees were 76 hours. 2. in July 2022 (random month), the monthly overtime hours for 10 out of 10 employees were 82 hours. 3. in January 2022 (random month), the monthly overtime hours for 10 out of 10 employees were 64-66 hours. 加班时间超过法规要求。通过文件审核，审核员发现在抽取的2022年11月份（当前月）的考勤中，10名随机抽取的员工中10人的月加班时间为76小时；2022年7月份（随机月）的考勤中，10名随机抽取的员工中10人的月加班时间为82小时；2022年1月份（随机月）的考勤中，10名随机抽取的员工中10人的月加班时间为64-66小时。	Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It was recommended that the facility should reduce the overtime hours to ensure it is within 36 hours per month.	
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7 - No Discrimination is Practiced

[Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

1. The facility had anti-discrimination policy and procedure;
2. The regular trainings on anti-discrimination were provided to the employees;
3. As informed by interviewed employees, most employees spoke highly of the facility owner;
4. No employee was required to do the examination of the hepatitis B virus and HIV;
5. No female employee was required to do the examination of pregnant test;
6. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work;
7. There was no evidence of sexual harassment;
8. No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union or workers' organisation membership or political affiliation was found in the facility;
9. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.

Evidence examined:

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

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 75%	Female: 25%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	3 female workers were the skilled quality inspection workers.	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation <input type="checkbox"/> Termination or retirement <input type="checkbox"/> Access to training <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	No discrimination about hiring, compensation, access to training, promotion, termination or retirement was found.	
Professional Development		

What type of training and development are available for workers?	The on-going work skill trainings were available for all workers to progress and develop. The criteria for promotion, training and compensation were equal, fair and transparent for all workers.
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

8 - Regular Employment Is Provided

[Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

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

Any other comments:

None

Responsible Recruitment

All Workers

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

- ☒ Terms & Conditions presented ☒ Understood by workers
- ☒ Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- ☐ Yes ☒ No

Migrant Workers

Type of work undertaken by migrant workers:	All types of work included migrant workers.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not applicable (there was no such kind of deduction from the workers' wages)
Is there any observation on this finding?	Not applicable (there was no such kind of deduction from the workers' wages)
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No All types of work (including management) in the facility include migrant employees. Such as the Production Manager, QC supervisor were migrant employees.
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable (there was no agency worker in the facility)
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable (there was no agency worker in the facility)
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable (there was no agency worker in the facility)
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No contractor was used by the facility.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Not applicable. No contractor was used by the facility.

8A - Sub-Contracting and Homeworking

[Summary of Findings]

8A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

1. Policy on sub-contracting
2. Reviewing of the production records such as materials in/out records.
3. Facility tour (Calculation on total production and estimated capacity)
4. Management interview and employee interview

Any other comments:

None

Summary of sub-contracting – if applicable

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

Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

9 - No Harsh or Inhumane Treatment is Allowed

[Summary of Findings]

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

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

Evidence examined:

1. Anti-harsh or anti-inhumane treatment policy and disciplinary procedure
2. Training records regarding anti-harsh or anti-inhumane treatment policy and disciplinary procedure
3. Internal grievance procedure
4. Facility tour
5. Management interview and employee interview

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility provided access to a confidential grievance mechanism for all workers.
If yes, are workers aware of these channels and have access? Please give details.	All employees were trained on the facility confidential grievance mechanism, and it was confirmed through interview with employees.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Worker representatives, suggestion box and employees also could oral to their team leader directly.
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other
Please provide grievance mechanism details	Use anonymous to report any issues through the grievance mechanism without any punishment or vengeance

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

10A - Entitlement to Work and Immigration

[Summary of Findings]

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

1. Per document review, facility management representation and employee interview, all employees in the facility were Chinese. There were 7 local employees and 22 domestic migrant employees in the facility. The migrant employees are from Guangxi, Hunan, Hubei and Henan provinces of China.
2. All employees had the proper legal rights to work in this region. The youngest age was 20 years old. All of them were recruited directly by the facility and no agency was involved in facility's recruitment processes.
3. No agency staff or foreign employee was used by the facility.

Evidence examined:

1. Hiring procedure
2. Personnel files
3. Employee handbook
4. Facility tour
5. Management interview and employee interview

Any other comments:

None

10B2 - Environment 2-Pillar
[Summary of Findings]

10B2: Compliance Requirements

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

10.B2.2 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:

1. The facility conducted some training for all employees on the avoidance of environmental impact.
2. The facility established the environmental protection policy. Environmental protection related records were provided for review.
3. Ms. Luo Meng Huo/Quality manager was appointed responsibility for environmental issues.
4. The facility had obtained certificate of ISO14000.

Evidence examined:

1. Environmental Impact Assessment report, Environmental Impact Assessment approval, environmental protection acceptance check report and pollutant discharging license were provided for review
2. Facility tour
3. Management interview and employee interview.

Any other comments:

None

Attachments



Toilet.JPG



Warehouse.JPG



Lab.JPG



Suggestion box.JPG



First aid kits.JPG



Fire sprinkle and smoke detector.JPG



Fire hydrant and fire fire extinguishers.JPG



Purifying.JPG



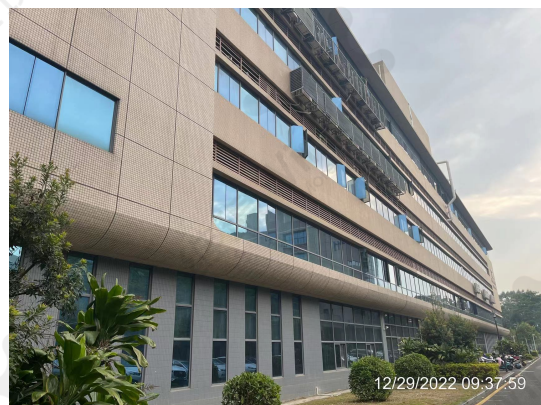
Facility name.JPG



Occupational hazardous notification.JPG



Fire Alarm.JPG



Production building.jpg



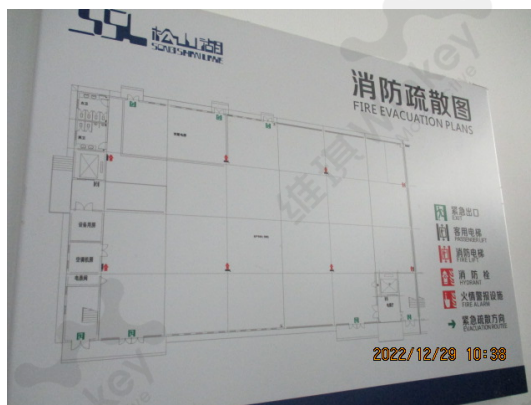
Facility gate.JPG



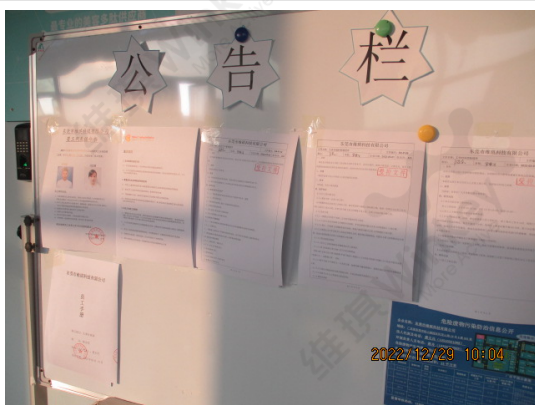
Evacuation sign.JPG



Eyewashing station.JPG



Evacuation map.JPG



ETI posted.JPG



Escape route with evacuation sign.JPG



Emergency light and exit sign.JPG



Electronic box.JPG



Drying.JPG



Drinkable water.JPG



Concentrating.JPG



Attendance machine.JPG



Chemical storage.JPG



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