

Sedex Members Ethical Trade Audit Report

Version 7



Contents

[Audit content](#)

[Audit and site details](#)

[Audit parameters](#)

[Audit attendance](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[0. Enabling accurate assessment](#)

[1. Employment is freely chosen](#)

[1.A. Responsible recruitment and entitlement to work](#)

[2. Freedom of association and right to collective bargaining are respected](#)

[3. Working conditions are safe and hygienic](#)

[4. Child labour shall not be used](#)

[5. Legal wages are paid](#)

[5.A. Living wages are paid](#)

[6. Working hours are not excessive](#)

[7. No discrimination is practiced](#)

[8. Regular employment is provided](#)

[8.A. Sub-contracting and homeworkers are used responsibly](#)

[9. No harsh or inhumane treatment is allowed](#)

[10.A. Environment 2-Pillar](#)

[10.B. Environment 4-Pillar](#)

[10.C. Business ethics](#)

[Attachments](#)

Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC422994377	Auditor company name	BCI Compliance Group Limited
Date of audit	2025-02-13	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS422994379	Site name	SHANDONG JYJ SAFETY PRODUCTS CO LTD
Business name	SHANDONG JYJ SAFETY PRODUCTS CO LTD	Site address	276000 Yangguang District, Banquan Town, Junan County, Linyi, Shandong, China, Linyi, CN
Site phone	18763778621	Site email	maggie@hxtgloves.com

Audit parameters

Time in and out	Day 1		Day 2		Day 3	
	In	09:03	In	09:18	In	09:11
	Out	16:55	Out	16:48	Out	11:25
Audit type	Periodic					
Was the audit announced?	Semi announced					
Was the Sedex SAQ available for review?	Yes					
Who signed and agreed CAPR?	Xiao Yuling / HR manager					
Any conflicting information SAQ/Pre-Audit Info	No					
Is further information available?	No					

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no union in the factory.		
Reason for absence during the audit	There was no union in the factory.		
Reason for absence at the closing meeting	There was no union in the factory.		

SMETA declaration

Auditor team

SMETA declaration	<p>I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.</p> <ol style="list-style-type: none"> 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. <p>This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.</p>		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	<p>The semi-announced window of this audit is from Feb. 10, 2025 to Mar. 10, 2025. Some findings were apply for 'Base code' under the Area of non-conformity/non-compliance, however, due to the system bug, it can't be selected.</p>		
Lead auditor	Bob Wang	APSCA Number	32400007
Additional auditor			
Date of declaration	2025-02-15		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Xiao Yuling
Title	HR manager
Date of declaration	2025-02-15

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600801977
	5.B Ensure that workers receive the insurance...	§2	NC ZAF600801979
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§3	NC ZAF600801978
	6.F Ensure that where overtime is used, it is...	§4	NC ZAF600801980
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	§5	NC ZAF-
	3.H Where identified as necessary to reduce r...	§6	NC ZAF-
	3.N Maintain a log of all hazardous substance...	§7	NC ZAF-
	3.R Provide clean and secure toilets, wash ar...	§8	NC ZAF-





































Local law issues

§1	Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 36 With regard to the workers who engage in operation exposed to occupational disease hazards, the employer shall, in accordance with the regulations of the public health administration department under the State Council, make arrangements for preservice, in-service and job leaving occupational health checkups and truthfully inform the workers of the results of the checkups. The expenses for occupational health checkups shall be borne by the employer. No employer may assign to workers who have not received pre-service occupational health check-ups any jobs exposed to occupational disease hazards, nor assign to workers forbidden jobs. Workers whose signs of job-related injuries are shown by occupational health checkups shall be transferred from their original posts and proper arrangements shall be made for them. With regard to workers who have not received occupational health checkups before leaving their jobs, the employer may not cancel or terminate the labor contracts concluded with them. Occupational health checkups shall be undertaken by the medical and health institutions approved by the public health administration departments of the people's government at or above the provincial level.
§2	Article 42 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.
§3	Code of Design on Building Fire Protection and Prevention, GB50016-2014 Article 3.6.12, liquid warehouse facilities shall be installed the antileakage device. For the warehouse of should take measures to prevent water immersion.
§4	Article 18 of Rules for Storage Fire Prevention Safety Management: The goods in storage should be classified for storage. The area occupied by any single stack shall preferably not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.
§5	In accordance with Article 73 of the Labour Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured labourers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for labourers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that labourers and entitled to, must be timely paid in full amount.
§6	Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.
§7	In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

§8

Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	i	i
9. No harsh or inhumane treatment is allowed	✓	✓	i	i
10.A. Environment 2-Pillar	✓	✓	i	i
10.C. Business ethics	✓	✓	i	i



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

Site details

Company and site details

Sedex company reference	ZC422994377	
Sedex site reference	ZS422994379	
Company name	SHANDONG JYJ SAFETY PRODUCTS CO LTD	
Business ownership type	GOODS	
Site name	SHANDONG JYJ SAFETY PRODUCTS CO LTD	
Site name in local language	山东景元记劳保用品有限公司	
GPS location	GPS address	Yangguang District, Banquan Town, Junan County, Linyi, Shandong, China
	Coordinates	N 35°7'47" E 118°42'11"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Xiao Yuling
	Job title	HR Manager
	Phone number	18763778621
	Email	maggie@hxtgloves.com
Applicable business and other legally required business license numbers and documents	Business license number: 91371327MA3TRAF33Q, Valid from Aug 17, 2020 to No fixed term.	

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of other textiles n.e.c.
	Secondary	
	Other	

Site activities

Product type	Manufacture of Labor protection gloves.
Process overview	Main product: Labor protection gloves. Main Process: knitting, mixing, rubber dipping, washing, printing, inspection, packing. Main equipment: knitting machine, Fully automatic glove production line, printing machine, sealing machine, packing machine. The factory had 18 production lines.
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	28768m ²	
Building 1	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as office
Building 2	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber dipping workshop
Building 3	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber dipping workshop

Site scope

Building 4	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber dipping workshop
Building 5	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber dipping workshop
Building 6	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber dipping workshop
Building 7	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Rubber Dipping workshop
Building 8	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Printing, Inspection and Packing workshop
Building 9	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Mixing workshop

Site scope

Building 10	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Warehouse
Building 11	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Warehouse
Building 12	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Warehouse
Building 13	Last construction works on site	2016
	If building is shared, provide details	N/A, the building is not shared
	Number of floors	1
	Description of floor activities	used as Washing workshop
Building 14	Last construction works on site	2017
	If building is shared, provide details	The landlord only leases first floor as a Knitting workshop and leaves the second floor unused.
	Number of floors	2
	Description of floor activities	used first floor as Knitting workshop
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	

Site scope

Is any activity conducted onsite not included within the scope of the audit? No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not provided
The company did not organise worker transport to the worksite.

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	95-100%	April	95-100%
	May	90-95%	June	95-100%
	July	90-95%	August	95-100%
	September	90-95%	October	90-95%
	November	95-100%	December	95-100%

Is there any night or back shift work at the site? Yes
Day Shift 7:00-11:30 13: 30-17:00 Night shift 19:00-23:00 1:00-5:00.

What percentage of the workforce, including temporary and agency workers, work during the night/ back shift? 46%

Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling? Yes
The interviews and sampling include worker samples from different processes in all shifts.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?

No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?

No

NA

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

No

NA

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	58 (31.7%)	125 (68.3%)	- -	183 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	58 (31.7%)	125 (68.3%)	- -	183 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	1 (50%)	1 (50%)	- -	2 (1.1%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	1 (50%)	1 (50%)	- -	2 (1.1%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Jilin and Guizhou province of China

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (50%)	1 (50%)	- -	2 (1.1%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	There was no obvious peak or non-peak month in the company.
Please list the nationalities of all workers, with the three most common nationalities listed first	Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	32%	68%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	58 (31.7%)	125 (68.3%)	- -	183 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	58 (31.7%)	125 (68.3%)	- -	183 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details NA

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	6 (54.5%)	5 (45.5%)	- -	11
Supervisors or team leaders	20 (80%)	5 (20%)	- -	25
Administrative staff	5 (29.4%)	12 (70.6%)	- -	17

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Group interviews Individual interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?

Yes

Was the interview sample representative of the gender composition of the workforce?

Yes

Number and size of group interviews

4 group of 5 workers, 6 individuals, total 26 workers

Did workers understand the purpose of the audit?

Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?

Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

What was the general attitude of the workers towards their workplace?

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	<p>Other (provide details)</p> <p>The workers did not express negative feedback.</p>
What did the workers like the most about working at this site?	<p>Equal opportunities</p> <p>Hours worked, rest days or breaks</p> <p>Grievance mechanisms</p> <p>Communication (e.g. from management)</p> <p>Training and development</p> <p>Accommodation standards</p> <p>Overtime</p> <p>Freedom of movement</p>
Additional comments	<p>The workers were assured of confidentiality, and they spoke freely of their views of the company. All workers said they were satisfied with their employment at the company and that they were satisfied with the current wages. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. If workers have any opinions, they can also provide feedback to their supervisors or worker representatives.</p>
Attitude of workers' committee/union representatives	<p>Two worker-representatives showed that the management was cooperative with workers and the workplace was generally acceptable. They were satisfied with management attitude and no negative evidence was observed that workers were treated differently.</p>
Attitude of managers	<p>The company management agreed that the auditor could access to all facilities, compound documents and records requested by the audit; to take photo of the company, to copy relevant document records and conduct confidential workers interview. During the audit, management showed they were willing to gradually improve all issues found on-site.</p>

Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	7	13	-	20
Workers interviewed individually	2	4	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	1	1	-	2
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	1	1	-	2

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.54%	0.54%	-	1.08%
Last full calendar year (2024)	1.08%	0.54%	-	1.62%
Previous full calendar year (2023)	0.54%	1.08%	-	1.62%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.22%	0.56%	-	0.78%
Last full calendar year (2024)	0.2%	0.55%	-	0.75%
Previous full calendar year (2023)	0.21%	0.56%	-	0.77%

* Number of days lost through job absence in the year, calculated as (the 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*100

Are accidents recorded?

Yes

Accident records were kept in files, and no accidents occurred in last year.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total

Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Current system:</p> <ol style="list-style-type: none"> 1.The factory allow the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself, and provide the auditor with genuine and authentic records. 2.No integrity case was occurred during the audit 3.The factory provide an accurate site description and Sedex site profile declared prior to the audit 4.The factory maintain a written human rights policy statement that was approved by top management, communicated to all personnel, and trained to relevant personnel. <p>Evidence examined:</p> <ul style="list-style-type: none"> Worker and management interview Human rights policy Site profile Employee manual Training records 		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	<p>Yes</p> <p>All employees were employed directed by the factory. The factory does not use labor agencies or subcontractors.</p>

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Employment is freely chosen"</p> <p>1. Policies and Procedures: Some Improvement Recommended The factory ensures the free resignation and voluntary employment of employees through the recruitment and resignation policies in the personnel management system, as well as the anti forced labor and anti human trafficking policies. All employees in the factory are directly recruited, and no other agencies or labor - dispatch companies are used to ensure the implementation of all policies. No update records were found for all policies.</p> <p>2. Resources: Grade: Some Improvement Recommended Mr. Yu/HR supervisor, who is responsible for this Base Code Area, is required to possess the necessary skills and have the seniority to manage Workplace Requirements. Mr. Yu is responsible for ensuring the resource allocation, approval, and regular review of these policies. He is also in charge of the specific duties of human resources work. However, there is no evidence indicating that there are substitute personnel in case of job changes or absences.</p> <p>3. Communication and Training: Grade: Some Improvement Recommended Training is conducted according to a documented plan/ procedure, which includes new workers and refresher training. However, they had not evaluated the effectiveness of employee training.</p> <p>4. Monitoring: Grade: Some Improvement Recommended Evidence collected and implemented through program defined monitoring programs and indicators. Mrs. Xiao HR Manager is responsible for supervising all collected records of violations of procedures. The records provided by the factory indicate that there have been no violations of procedures. No record of supervision frequency provided by the factory.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current system:

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

Evidence examined:

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

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Responsible recruitment and entitlement to work"</p> <p>1.Policies and Procedures: Grade: Some Improvements Recommended The factory has a personnel management system. The recruitment policy within this system ensures the factory's responsible recruitment practices and the work rights of employees. The personnel management system also includes policies regarding the signing of labor contracts with employees and the verification of their identity information to ensure that there are no child laborers or under - age employees. All employees in the factory are recruited directly through advertisements or referrals by internal employees. No other agencies or labor - dispatch companies are used to ensure the implementation of all policies. No update records were found for all policies.</p> <p>2.Resources: Grade: Some Improvements Recommended Mr. Yu/HR supervisor is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. Mr. Yu is responsible for ensuring the resource allocation, approval, and regular review of these policies. He is also in charge of the specific responsibilities for employee recruitment. However, there is no evidence indicating that there are substitute personnel in case of job changes or absences.</p> <p>3.Communication and Training: Grade: Some Improvement Recommended Training is conducted according to a documented plan/ procedure, which includes assessment and refresher training. However, the training records of new employees show that the training time is set in the month of employment, instead of them participating the training in a timely manner.</p> <p>4.Monitoring: Grade: Some Improvement Recommended Evidences of monitoring procedures and metrics collection defined by procedure and Evidences of implementation are available. Mrs. Xiao/HR Manager is responsible for supervising all collected records. However, Mrs. Xiao didn't take corrective measures for new employees who failed to attend training in a timely manner.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
-----------	-----------------------	-----------	---------

No findings

Systems and evidence examined to validate this code section

Current system:

1. The factory had policy and procedures on legal employment outlining all workers (including non-directly hired workers) have the legal right to work, or require any labor provider and on-site.
2. All workers would be reviewed and validated with the original documentation before they were employed. The factory recruited the new workers by the advertisements or the workers' recommendation. Based on documents review, the factory kept valid and sufficient age information such as copies of ID card, education certificate or other documents with employment history.
3. Through document review, workers and management interviews, it was confirmed that all employees in the factory were Chinese, there was no foreign employee hired in the factory.
4. The nature of work, working conditions, living conditions, employment terms, living costs, wages and benefits accurately reflect those communicated to workers during recruitment. Labor contract was signed between the factory with workers, a copy of labor contract was kept by workers.
5. No labor agency was used by the factory.
6. No sub-contractor was used by the factory.
7. As per management interview and documents review, if the facility needed labor provider or on-site sub-contractor, they would sign service agreement with them outlining that:
 - 1). Labor provider or on-site subcontractor must ensure no recruitment fees or related costs were incurred or charged to workers.
 - 2). Once recruitment fees or related costs (legal or otherwise, as defined by the ILO and including travel and visa costs) were paid by workers, the facility would fully reimburse in a timely manner.

Evidence examined:

Hiring policy and procedure.
Personnel files and labor contracts.
Worker handbook.
Worker roster.
Worker and management interview.

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	1%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Guizhou & Jilin province of China.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
-------------------------------------------------------------------------------------------------------------------	----------------

Were recruitment fees or costs identified during worker interviews?	No
	No negative evidence was found.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Freedom of association and right to collective bargaining are respected"</p> <p>1. Policies and Procedures: Grade: Some Improvements Recommended The factory has established a freedom of association policy. This policy includes procedures for the fair and free selection and election of representatives, as well as their rights to participate in collective bargaining. No update records were found for all policies.</p> <p>2. Resources: Grade: Some Improvements Recommended Mr. Yu/HR supervisor is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. The employees of the factory elected two employee representatives through a collective vote. Through regular meetings between the employee representatives and the management, the representatives provide feedback on the employees' opinions to the management. Employees can also file complaints or appeals to the company's management through the employee representatives. However, there is no evidence indicating that there are substitute personnel in case of job changes or absences.</p> <p>3. Communication and Training: Grade: Some Improvement Recommended Training is conducted according to a documented plan/ procedure, which includes assessment and refresher training. However, the training records of new employees show that the training time is set in the month of employment, instead of them participating the training in a timely manner.</p> <p>4. Monitoring: Grade: Some Improvement Recommended Evidences of monitoring procedures and metrics collection defined by procedure and Evidences of implementation are available. Mrs. Xiao/HR Manager is responsible for supervising all collected records. However, Mrs. Xiao didn't take corrective measures for new employees who failed to attend training in a timely manner.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
-----------	-----------------------	-----------	---------

No findings

Systems and evidence examined to validate this code section

Current systems:
1.The Chinese constitution guarantees Freedom of Association; However, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union. All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.
2.No trade union was established in the factory, but 2 worker representatives were elected in the factory. The worker representative attended the opening and closing meeting during the audit.
3.The worker representatives' meeting was conducted quarterly.
4.Through worker interview, the worker could raise their grievances or complaint through worker representative or management directly.

Evidence examined:
The policy on freedom of association
Interview with workers and management
Interview with worker representative
Election and meeting minutes

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Fundamental Improvements Required
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>The management system for "Working conditions are safe and hygienic"</p> <p>1. Policies and Procedures: Grade: Some Improvement Recommended The factory has policies such as the "Health and Safety Control Procedures", "Emergency Management Control Procedures", "Fire Safety Management System", and "Chemical Dangerous Goods Management System". There is also a practice of regularly detecting policy loopholes and maintaining update records. This ensures that the policies and procedures related to employee health and safety are complete and updated in a timely manner. No update records were found for all policies.</p> <p>2. Resources: Grade: Fundamental Improvements Required Mr. Xiang/Comprehensive Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. However, oversights in the management structure leading to non-compliances in nature.</p> <p>3. Communication and Training: Grade: Fundamental Improvements Required Training is conducted according to a documented plan/ procedure, and refresher training is provided annually. However, some employees did not fully understand the training content and requirements. No effective mechanism is in place to ensure the training effectiveness, as it was noted that the factory should provide occupational medical check-up to workers who were exposed to hazardous work environment when they taking the job and leaving the posts, the facility did not equip secondary containers for its chemicals (such as latex and printing ink) stored in the chemical warehouse and Rubber processing aids in mixing workshop, that about 8% of the workers in printing workshop did not wear or correctly wear protective masks, that the gap between some stacks and walls was 0 meter in the warehouse, which was less than the local law of 0.5 meter.</p> <p>4. Monitoring: Grade: Fundamental Improvements Required Monitoring in place for the code element in general but some elements are overlooked and failure in monitoring has led to Major NC.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
-----------	-----------------------	-----------	---------

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	§1	NC	ZAF-
	3.H Where identified as necessary to reduce r...	§2	NC	ZAF-
	3.N Maintain a log of all hazardous substance...	§3	NC	ZAF-
	3.R Provide clean and secure toilets, wash ar...	§4	NC	ZAF-

Systems and evidence examined to validate this code section

Current systems:

1. General Health and Safety management.
 - There was Health & Safety Manager appointed for the site.
 - Potable water was freely available in all areas.
 - Sufficient clean toilets were available at all times to workers.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Minutes of meetings show that there were monthly meetings between the H&S committee (workers) and the H&S manager, and each point is acted on.
 - It was noted that occupational health check was provided to workers that exposed to hazardous factors, such as noise and dust, however, the factory did not provide occupational health check for workers when they taking the job and leaving the posts.
2. Fire Safety
 - There were sufficient exits from each work area and were clearly marked.
 - Fire fighting equipment was adequate and checks were up-to-date.
 - Evacuation plans were posted in all areas and understood by all workers interviewed.
 - Fire drills were organized and recorded twice per year.
 - No gap between stack and wall were found during the audit.
3. Electrical and machine safety
 - There was one electrician in the factory. The certificate was provided by the factory for review during the audit.
 - All electrical equipment was maintained in good condition.
4. Medical services
 - There were adequate first aid kits in each production area.
 - There were First aid training staffs trained by local Red Cross.
5. Chemical Safety
 - Chemical was used during production. MSDS and chemical training provided.
 - It was noted that the facility did not equip secondary containers for its chemicals (such as latex and printing ink) stored in the chemical warehouse and Rubber processing aids in mixing workshop.
6. PPE
 - PPE was provided to relevant workers and PPE signs posted in workshops.
 - It was noted that about 8% of the workers in printing workshop did not wear or correctly wear protective masks. although the factory had provided to them.

Evidence examined:

- ##### Details
- 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 register
 - Accident reports
 - Chemical list and MSDS for each chemical
 - Potable water testing certificates
 - Interviews with H&S manager
 - Interviews with workers and H&S committee members

Findings: non-compliances

ZAF-		Non-compliance
Code area	3 Working conditions are safe and hygienic	Status Open*
Workplace requirement	3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.	Time given to resolve 60 days
Issue title	318 - Inadequate/isolated failure in conducting medical examinations or occupational health checks, including disease checks, of workers in hazardous situations(e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)	Verification method Desktop audit
Description	It was noted that occupational health check was provided to workers that exposed to hazardous factors, such as noise and dust, however, the factory did not provide occupational health check for workers when they taking the job and leaving the posts. 审核发现工厂为接触职业危害因素的工人（如噪声，粉尘）提供了职业病体检，但是工厂没有提供入职和离岗的职业病体检。	Area of non-compliance/non-conformance Local law Base code
Corrective and preventative actions	It is recommended that the factory should provide occupational medical check-up to workers who were exposed to hazardous work environment when they taking the job and leaving the posts. . 建议工厂为接触职业危害因素的工人提供入职前以及离职的职业病体检。	
Local law reference	Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 36 With regard to the workers who engage in operation exposed to occupational disease hazards, the employer shall, in accordance with the regulations of the public health administration department under the State Council, make arrangements for preservice, in-service and job leaving occupational health checkups and truthfully inform the workers of the results of the checkups. The expenses for occupational health checkups shall be borne by the employer. No employer may assign to workers who have not received pre-service occupational health check-ups any jobs exposed to occupational disease hazards, nor assign to workers forbidden jobs. Workers whose signs of job-related injuries are shown by occupational health checkups shall be transferred from their original posts and proper arrangements shall be made for them. With regard to workers who have not received occupational health checkups before leaving their jobs, the employer may not cancel or terminate the labor contracts concluded with them. Occupational health checkups shall be undertaken by the medical and health institutions approved by the public health administration departments of the people's government at or above the provincial level.	
* PDF generated at 07:38 (UTC) on 25 Feb 2025. View this finding on the Sedex platform for live updates and closure details.		

ZAF-		Non-compliance
Code area	3 Working conditions are safe and hygienic	Status Open*

Workplace requirement	Time given to resolve
3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).	30 days
Issue title	Verification method
278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Desktop audit
Description	Area of non-compliance/non-conformance
It was noted that about 8% of the workers in printing workshop did not wear or correctly wear protective masks. although the factory had provided to them. 审核发现尽管工厂提供了防护口罩，但是印刷车间大约8%的工人没有佩戴或正确佩戴。	Local law
	Base code
Corrective and preventative actions	
It is recommended that management adopt practices and controls to ensure that necessary personal protective equipments are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately. 建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。	

Local law reference


Article 42 of Law of the People’s Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.



[Not correctly wear PPE.jpg](#) 

* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-	Non-compliance
Code area	Status
3 Working conditions are safe and hygienic	Open*

Workplace requirement 3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.		Time given to resolve 30 days
Issue title 240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbunded)		Verification method Desktop audit
Description It was noted that the facility did not equip secondary containers for its chemicals (such as latex and printing ink) stored in the chemical warehouse and Rubber processing aids in mixing workshop. 仓库内存放的化学品如乳胶和打印油墨以及搅拌车间的橡胶加工助剂没有设置二次容器。		Area of non-compliance/non-conformance Local law Base code
Corrective and preventative actions It is recommended that the factory should provide facility for preventing liquid chemicals flooding and spreading in chemical warehouse and workshop. 工厂应为仓库和生产车间的化学品设置防泄漏设施。		
Local law reference Code of Design on Building Fire Protection and Prevention, GB50016-2014 Article 3.6.12, liquid warehouse facilities shall be installed the antileakage device. For the warehouse of should take measures to prevent water immersion.		
Evidence		
		No secondary containers.jpg

No secondary containers.jpg

* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF-	Non-compliance
Code area 3 Working conditions are safe and hygienic	Status Open*

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Issue title

327 - Storage of goods not in line with legal requirements (e.g. too high)

Description

It was noted that the gap between some stacks and walls was 0 meter in the warehouse, which was less than the local law of 0.5 meter. 审核员发现工厂仓库部分物品垛与墙的间距为0米，小于法定0.5米的要求。

Corrective and preventative actions

It is recommended that management adopt practices and a control to ensure that width of gap between stacks and walls are in accordance with the local law. 建议工厂确保仓库库存物品垛与墙的间距符合法律要求。

Local law reference

Article 18 of Rules for Storage Fire Prevention Safety Management: The goods in storage should be classified for storage. The area occupied by any single stack shall preferably not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.

Evidence



[No gap between stacks and wall.jpg](#)



* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Nitrile, latex, ink, color paste.
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable NA, no additional structure.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Child labor shall not be used"</p> <p>1.Policies and Procedures: Grade: Robust The factory has established the "Child Labor and Young Worker Control Procedures" and the "Child Labor Rescue Procedures", as well as relevant recruitment systems and reporting and complaint systems. The "Child Labor Rescue Procedures" clearly stipulate that once child labor is discovered, the work shall be stopped immediately, and the child laborer shall be protected. At the same time, the guardian will be contacted. After confirmation with the guardian, the child laborer will be escorted home in a timely manner. In case of other situations, the child laborer shall be properly resettled under the supervision of the local civil affairs department or child protection agency. The factory will bear the reasonable expenses incurred in rescuing the child laborer and provide financial compensation to the child laborer.</p> <p>2.Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for ensuring the resource allocation, approval, and regular review of these policies. She is also in charge of verifying the age of employees during the recruitment process, as well as handling reports and complaints. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have been established.</p> <p>3.Communication and Training: Grade: Some Improvement Recommended Training is conducted according to a documented plan/ procedure, which includes assessment and refresher training. However, the training records of new employees show that the training time is set in the month of employment, instead of them participating the training in a timely manner.</p> <p>4.Monitoring: Grade: Some Improvement Recommended Evidences of monitoring procedures and metrics collection defined by procedure and Evidences of implementation are available. HR Manager Xiao is responsible for supervising all collected records. However, HR Manager Xiao didn't take corrective measures for new employees who failed to attend training in a timely manner.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1.The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their original copies of ID card were kept in their personnel file. And the policy stated that the factory never employed and used any child labor under the age of 16 years old. 2.The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labor office, also will not arrange young workers to hazardous post. 3.Checks of all workers files showed that no child labor or young worker was identified during the audit. The youngest worker in the factory was 22 years old, who was born on Mar. 13, 2002 and entered the factory on Oct. 21, 2023. 4.Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labor. <p>Evidence examined:</p> <ul style="list-style-type: none"> Policy on workers recruitment Personnel files including the ID card copies of workers Roster and labour contracts of all workers Worker and management interview 		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	1%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	22
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>The management system for "Legal wages are paid"</p> <p>1. Policies and Procedures: Grade: Robust The factory has formulated the "Wage and Compensation Control Procedures" to meet local minimum - wage standards and provide a basis for wage - payment management. This procedure also stipulates that the factory must pay employees' wages in full and on time before the date specified in the labor contract. The factory's personnel management system further stipulates that it will provide social insurance, medical insurance, and various welfare benefits required by laws and regulations to eligible employees.</p> <p>2. Resources: Grade: Some Improvement Recommended Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have not been established.</p> <p>3. Communication and Training: Grade: Some Improvement Recommended Training is conducted according to a documented plan/ procedure, also provide refresher training annually. However, no training program included that encourage employees to actively participate in social insurance.</p> <p>4. Monitoring: Grade: Fundamental Improvements Required Monitoring does not ensure sufficient management of code requirements on an ongoing basis and failure in monitoring has led to major NC.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600801977
	5.B Ensure that workers receive the insurance...	§2	NC ZAF600801979

Systems and evidence examined to validate this code section

Current systems:

1. All workers' wages were calculated by hourly rate.
2. Minimum wage guarantee system was established for all workers. Workers' minimum wages was RMB2000/month(RMB 11.5/hour), which was above the local legal requirement.
3. The factory paid overtime wage to employees as per local law.
4. The factory only provided social insurances for 94 out of 196 eligible workers.
5. All workers were paid on or before 30th of following month in cash and it was agreed by all workers, each worker was given a pay slip and signed for their wages.
6. All workers were provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they were paid.

Evidence examined:

Payroll records from Jan. 2024 to Dec.2024
 Attendance records Jan. 2024 to audit day.
 Local legal minimum wage documents
 Wages and benefits policy
 Labor contracts for all employees
 Leave records and resignation records
 Payment receipts of social insurance
 Workers and management interview

Findings: non-compliances

ZAF600801977

Non-compliance

Due 2023-05-30

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

According to the social insurance payment receipt provided by factory management, it was noted that the factory's social insurance coverage was insufficient. Not all employees participated in social insurance. According to the social insurance payment receipt provided by the factory management, it was noted that only 94 out of 236 employees (including 196 eligible to social insurance coverage and 40 rehired employees) were provided with pension, unemployment, medical, maternity and injury insurance. Remark: Commercial accident insurance was provided to 236 employees. Valid from January 3, 2025 to January 2, 2026. 工厂的社会保险覆盖范围不足。并非所有的雇员都参加了社会保险。根据工厂管理层提供的社会保险缴费收据，236名员工（196名应参加社保和40名退休返聘员工）中只有94人获得了养老、失业、医疗、生育和工伤保险。备注：工厂为236名员工提供了商业意外保险。有效期：2025年1月3日至2026年1月2日。

Area of non-compliance/non-conformance

Local law

Description (carried over)

According to the social insurance payment receipt provided by factory management, it was noted that the factory's social insurance coverage was insufficient. Not all employees participated in social insurance. According to the social insurance payment receipt provided by the factory management, it was noted that only 104 out of 238 employees (including 191 eligible to social insurance coverage and 47 rehired employees) were provided with pension, unemployment, medical, maternity and injury insurance. Remark: Commercial accident insurance was provided to 331 employees. Valid from January 30, 2023 to January 29, 2024. 工厂的社会保险覆盖范围不足。并非所有的雇员都参加了社会保险。根据工厂管理层提供的社会保险缴费收据，238名员工（191名应参加社保和47名退休返聘员工）中只有104人获得了养老、失业、医疗、生育和工伤保险。备注：工厂为331名员工提供了商业意外保险。有效期：2023年1月30日至2024年1月29日。

Corrective and preventative actions

It is recommended that the factory should provide social insurance for all employees as per legal requirements. 建议工厂依法给所有员工缴纳社会保险。

Corrective and preventative actions (carried over)

It is recommended that the factory should provide social insurance for all employees as per legal requirements. 建议工厂依法给所有员工缴纳社会保险。

Local law reference

In accordance with Article 73 of the Labour Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured labourers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for labourers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that labourers and entitled to, must be timely paid in full amount.

Evidence



Insufficient Social Insurance Coverage.jpg

* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600801979

Non-compliance

Due 2024-05-14

Code area

5 Legal wages are paid

Status

Closed (2025-02-25)*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

Based on document review and management interview, it was noted that there were 242 employees in the factory, 55 of them had reached retire age. The factory provided basic endowment insurance, unemployment insurance, maternity insurance, work related injury insurance and medical insurance for 99 out of 187 (52.9%) eligible employees. Remark: The factory provided commercial accident insurance for all the employees who were not covered by social insurance, the insurance was valid from Nov. 8, 2023 to Nov. 7, 2024. 根据文件审核及管理层访谈，工厂共有242名员工，其中55人已达到退休年龄，工厂为符合参保条件的187名员工中的99人（52.9%）缴纳了养老、医疗、生育、工伤和失业保险。备注：工厂为所有没有社保的员工购买了商业意外险，保险有效期自2023年11月8日至2024年11月7日。

Area of non-compliance/non-conformance

Local law

Description (carried over)

Based on document review and management interview, it was noted that there were 242 employees in the factory, 55 of them had reached retire age. The factory provided basic endowment insurance, unemployment insurance, maternity insurance, work related injury insurance and medical insurance for 99 out of 187 (52.9%) eligible employees. Remark: The factory provided commercial accident insurance for all the employees who were not covered by social insurance, the insurance was valid from Nov. 8, 2023 to Nov. 7, 2024. 根据文件审核及管理层访谈，工厂共有242名员工，其中55人已达到退休年龄，工厂为符合参保条件的187名员工中的99人（52.9%）缴纳了养老、医疗、生育、工伤和失业保险。备注：工厂为所有没有社保的员工购买了商业意外险，保险有效期自2023年11月8日至2024年11月7日。

Corrective and preventative actions

It is recommended that the factory should provide social insurance for all employees as per legal requirements. 建议工厂按照法律要求为所有员工提供社会保险。

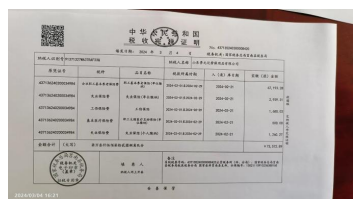
Corrective and preventative actions (carried over)

It is recommended that the factory should provide social insurance for all employees as per legal requirements. 建议工厂按照法律要求为所有员工提供社会保险。

Local law reference

Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers are entitled to, must be timely paid in full amount.

Evidence



[Insufficient Social Insurance Coverage-3.jpg](#)



[Insufficient Social Insurance Coverage-2.jpg](#)



[Insufficient Social Insurance Coverage-1.jpg](#)



* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	<p>The legal minimum wage Wages meet a living wage Other (provide details)</p> <p>The factory paid the minimum wage was RMB2000/month, which was above legal minimum wage.</p>
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	<p>Does not use digital payments (give details)</p> <p>All workers were paid in cash.</p>
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
------------------------------------------------------------------------------------------------------------------------	----------------

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly
Is actual wage data available on site for any of these options?	Monthly
Maximum legal working hours	<p>Max hours per day 8.0</p> <p>Max hours per week 40.0</p> <p>Max hours per month Non applicable</p>
Actual required working hours	<p>Required hours per day 8.0</p> <p>Required hours per week 40.0</p> <p>Required hours per month 174.0</p>

Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	16.0
	Max hours per month	67.0
Minimum legal wage	Min per hour	10.46
	Min per day	83.68
	Min per week	418.39
	Min per month	1820.0
Actual minimum wage	Actual per hour	11.5
	Actual per day	91.95
	Actual per week	459.77
	Actual per month	2000.0
Minimum legal overtime wage	Min per hour	15.69
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	17.24
	Actual per day	17.24
	Actual per week	235.63
	Actual per month	736.0

Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 workers' records from most current month of Dec. 2024 26 workers' records from Jun. 2024 (random month) 26 workers' records from Mar. 2024 (random month)

Are there different legal minimum/ legally recognised CBAs wage grades?

No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?

Above legal minimum

Indicate the breakdown of workforce per earnings

Under minimum wage: 0%
Min wage: 0%
Above min wage: 100%

Are there any bonus schemes used?

No

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<div>Current systems</div> <div>1. The factory had completed a living wage analysis base on IDH Wage Indicator Typical Family Methodology, and understood what proportion of the workforce had a gap.</div> <div>2. The factory had reviewed workers' total pay including benefits, compared it with a credible living wage.</div> <div>3. The factory had made a wage increase plan (aiming to keep employees' income higher than the living wage) including all necessary information, such as clear time frame, covering all workers, based on a credible living wage calculation etc.</div> <div>Evidence examined:</div> <div>Worker and management interview</div> <div>Payroll records from Jan. 2024 to Dec.2024</div> <div>Local legal minimum wage documents</div> <div>Calculation record of living wage</div> <div>Wage and benefits policy</div> <div>Labor contracts for all employees</div> <div>Wage increase plan</div>		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>The management system for "Working hours are not excessive"</p> <p>1. Policies and Procedures: Grade: Some Improvements Recommended The factory has a "Working Hours Management Policy". It stipulates that working hours shall comply with labor laws, with overtime not exceeding 3 hours per day and the monthly overtime duration not exceeding 36 hours. However, the factory does not have a procedure for regularly assessing its production capacity to ensure that the existing production capacity can meet order requirements.</p> <p>2. Resources: Grade: Some Improvements Recommended Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have not been established.</p> <p>3. Communication and Training: Grade: Some Improvements Recommended Training is carried out in accordance with the documented plans/procedures, and refresher training is provided annually. Through interviews, managers, supervisors and workers are well aware of the significance of the policy on overtime control. However, employees would prefer to work more overtime to earn more income.</p> <p>4. Monitoring: Grade: Fundamental Improvements Required Monitoring does not ensure sufficient management of code requirements on an ongoing basis and failure in monitoring has led to major NC.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC ZAF600801978
	6.F Ensure that where overtime is used, it is...	§2	NC ZAF600801980

Systems and evidence examined to validate this code section

Current systems:

1. Through employees' interview, overtime was voluntary.
2. According to attendance records and worker interview, basic working hours were 8 hours per day and 40 hours per week.
3. Office 7:30-11:30 13:30-17:30 Workshop Day Shift 7:00-11:30 13:30-17:00 Night shift 19:00-23:00 1:00-5:00.
4. Facial recognition system was used to record workers' attendance records.
5. All the sampled workers worked more than 36 hours of overtime per month, which was not compliance with local law.
6. All sampled workers were required to work not more than 60 hours per week.
7. All sampled workers enjoyed one day off per seven days, the maximum continuous working days were 6 days.

Evidence examined:

- Workers' interview
- Management interview
- Local and national laws
- Factory policy on working hours
- Attendance records
- Computerized time logging system
- Sample pay slips with recorded hours all workers interviewed
- Workers' contracts
- 13 months' attendance records to establish highest and lowest hours over all employees
- Quality and production records to cross check hours

Findings: non-compliances

ZAF600801978

Non-compliance

Due 2023-05-30

Code area

6 Working hours are not excessive

Status

Closed (2025-02-25)*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

60 days

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)

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Description

It was noted that 10 out of 10 sample population employees worked in excess of the statutory overtime hour limits. A review of 10 sample population employees' time records of May 2022, October 2022 and January 2023 yielded the following: 26 randomly selected workers maximum overtime working reached to 48 hours in May 2022 (random month), 66 hours in October 2022(random month), which wasn't in compliance with the legal requirement. Remark: The factory didn't obtain the Comprehensive Working Hours System Approval. 根据厂方提供的工时记录，审核员选取的 26 名抽样员工加班时间超出了法定标准。随机抽取的26名员工2022年5月、2022年10月和2023年1月的记录进行查看，发现具体为：2022年5月的加班时间最多为48小时，2022年10月的加班时间最多为66小时超过每月加班时间不能超过36小时的法律规定。备注：工厂未获得综合计时批文。

Description (carried over)

It was noted that 10 out of 10 sample population employees worked in excess of the statutory overtime hour limits. A review of 10 sample population employees' time records of May 2022, October 2022 and January 2023 yielded the following: 26 randomly selected workers maximum overtime working reached to 48 hours in May 2022 (random month), 66 hours in October 2022(random month), which wasn't in compliance with the legal requirement. Remark: The factory didn't obtain the Comprehensive Working Hours System Approval. 根据厂方提供的工时记录，审核员选取的 26 名抽样员工加班时间超出了法定标准。随机抽取的26名员工2022年5月、2022年10月和2023年1月的记录进行查看，发现具体为：2022年5月的加班时间最多为48小时，2022年10月的加班时间最多为66小时超过每月加班时间不能超过36小时的法律规定。备注：工厂未获得综合计时批文。

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。

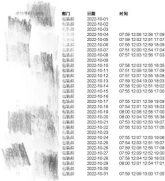
Corrective and preventative actions (carried over)

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。

Local law reference

In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

Evidence



Page 14/1

[Attendance record.jpg](#)



* PDF generated at 07:38 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600801980

Non-compliance

Due 2024-05-14

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

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)

Description

It was noted that 26 out of 26 sample employees worked in excess of the statutory overtime hour limits. A review of 26 sample population employees' time records of Mar. 2024, Jun. 2024 and Dec. 2024 yielded the following: 26 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 40-67 hours) in Mar. 2024, which wasn't in compliance with the legal requirement; 26 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 40-56 hours) in Jun. 2024, which wasn't in compliance with the legal requirement. 12 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 60.5 hours) in Dec. 2024, which wasn't in compliance with the legal requirement. Remark: The factory didn't obtained the Comprehensive Working Hours System Approval. 根据厂方提供的工时记录, 审核员选取的26个样本中的26个样本员工加班时间超出了法定标准。审核员从厂方提供的工时记录中抽取26名员工的2024年3月、2024年6月和2024年12月记录进行查看, 发现具体为: 26/26名员工在2024年3月的加班时间为40-67小时, 超过每月加班时间不能超过36小时的法律规定; 26/26名员工在2024年6月的加班时间为40-56小时, 超过每月加班时间不能超过36小时的法律规定; 12/26名员工在2024年12月的加班时间为60.5小时, 超过每月加班时间不能超过36小时的法律规定。备注: 工厂未获得综合计时批文。

Description (carried over)

It was noted that 26 out of 26 sample employees worked in excess of the statutory overtime hour limits. A review of 26 sample population employees' time records of Mar. 2023, Jul. 2023 and Jan. 2024 yielded the following: 26 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 78-86 hours) in Mar. 2023, which wasn't in compliance with the legal requirement; 26 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 82-92 hours) in Jul. 2023, which wasn't in compliance with the legal requirement. 26 out of 26 employees worked in excess of 36 overtime hours per month was (i.e. 53.5-83 hours) in Jan. 2024, which wasn't in compliance with the legal requirement. Remark: The factory didn't obtained the Comprehensive Working Hours System Approval. 根据厂方提供的工时记录, 审核员选取的26个样本中的26个样本员工加班时间超出了法定标准。审核员从厂方提供的工时记录中抽取26名员工的2023年3月、2023年7月和2024年1月记录进行查看, 发现具体为: 26/26名员工在2023年3月的加班时间为78-86小时, 超过每月加班时间不能超过36小时的法律规定; 26/26名员工在2023年7月的加班时间为82-92小时, 超过每月加班时间不能超过36小时的法律规定; 26/26名员工在2024年1月的加班时间为53.5-83小时, 超过每月加班时间不能超过36小时的法律规定。备注: 工厂未获得综合计时批文。

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂 确保员工的加班时间符合法律要求。

Corrective and preventative actions (carried over)

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂 确保员工的加班时间符合法律要求。

Local law reference

Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

Evidence

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

69

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A, the site paid more than 125% OT premium.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	54.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	56.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "No discrimination is practiced"</p> <p>1. Policies and Procedures: Grade: Robust The factory has a clear anti - discrimination policy, which opposes any form of discrimination, including but not limited to discrimination based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership, or political affiliation. The personnel management policy is sufficient to prevent discrimination at all stages of employment, including but not limited to hiring, compensation, training opportunities, promotion, dismissal, or retirement. Moreover, a reporting and complaint procedure has been established to ensure that reports and complaints are resolved in a timely manner.</p> <p>2. Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for ensuring fairness in employee recruitment and personnel management. She has set up a supervision team with the participation of employee representatives to oversee fairness. Additionally, she is in charge of handling reports and complaints regarding discrimination. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have been established.</p> <p>3. Communication and Training: Grade: Some Improvement Recommended Anti - discrimination training is provided to all employees to clarify the anti - discrimination policy. Any form of discrimination is opposed, including but not limited to discrimination based on race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership, or political affiliation. Employees are encouraged to report and file complaints about any discriminatory incidents they discover. When new employees go through the on - boarding process, they are trained on the anti - discrimination and reporting - complaint policies. Regular reinforcement training is carried out for all employees. But, during the document review, the factory did not provide new employee training records.</p> <p>4. Monitoring: Grade: Some Improvement Recommended Evidence collected and implemented through program defined monitoring programs and indicators. HR Manager Xiao is responsible for supervising all collected records of violations of procedures. The records provided by the factory indicate that there have been no violations of procedures. No record of supervision frequency provided by the Mrs. Xiao.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. According to management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc. Female workers and male workers had the same pay and working conditions as male workers. Promotion was based on workers' ability and skill. Training was based on working requirement. 2. There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found. 3. There was no evidence of sexual harassment 4. The management generally knew the requirement of Non-Discrimination. 5. As informed by interviewed workers, most workers spoke highly of the factory management. 6. According to management interview and worker interview, the factory dedicated equity approach in recruitment, training, development and promotion processes. <p>Evidence examined:</p> <ul style="list-style-type: none"> The hiring and termination procedure, leave application records and employee handbook. Payroll records Attendance records Termination records Training records 		

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	1%
Representation of women in managerial roles (ratio of women workers to women managers)	4%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	4%
Three most common nationalities in managerial and supervisory roles	Chinese

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Regular employment is provided"</p> <p>1. Policies and Procedures: Grade: Robust The factory's "Employment and Termination Procedures" and "Personnel Management Procedures" stipulate that the factory signs contracts compliant with regulatory standards with all employees. The contract clearly states the contract term, job position, working hours, and salary and benefits. Meanwhile, it is stipulated that both the employee and the factory shall hold one copy of the labor contract. The Personnel Management Procedures also clearly stipulate that no labor intermediary companies or labor dispatch services are used. All employees must be directly recruited by the factory and sign labor contracts.</p> <p>2. Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for employee recruitment and personnel management, and signs labor contracts with employees on behalf of the company during the onboarding process. After the labor contract expires, she renews fixed-term or open-ended contracts with employees under the conditions compliant with the Labor Law. In the event of job changes or staff absences, she formulates procedures for arranging temporary responsibilities.</p> <p>3. Communication and Training: Grade Some Improvements Recommended The training is under the responsibility of Mrs. Xiao. The hiring and termination procedure is one of the training contents. However, among the interviewed employees, the awareness of this procedure was relatively low. Mrs. Xiao is in charge of HR tasks such as handling employees' recruitment, resignation procedures and contract signing. Currently, there was no documented process to ensure that newly recruited HR staff can receive training in a timely manner.</p> <p>4. Monitoring: Grade Some Improvements Recommended Evidence collected and implemented through program defined monitoring programs and indicators. Mrs. Xiao is responsible for supervising all collected records. But no record of supervision frequency provided by Mrs. Xiao.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. According to workers interview and management interview, workers signed contracts with the factory as local law's requirement. 2. All interviewed workers indicated that they were provided with contract copies to know all items included. 3. No temporary worker, apprenticeship schemes or home worker was identified 4. The factory saved all workers' personal files and contracts for review. 5. The factory established employment procedure for workers' recruitment 6. No labour agency was used to hire workers. <p>Evidence examined</p> <ul style="list-style-type: none"> The hiring and termination procedure Personal files Payroll records Labour contracts Worker and management interview 		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Sub-contracting and homeworkers are used responsibly"</p> <p>1.Policies and Procedures: Grade: Robust The factory's "Personnel Management Procedures" stipulate that the factory only employs directly - recruited workers and does not use homeworkers, dispatched workers, or temporary workers. The Social Responsibility Manual states that the factory does not use subcontractors, and all products and processes are carried out within the factory to ensure consistent product quality.</p> <p>2.Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for the factory's personnel management and production arrangements, and ensures that the company's policies are implemented.</p> <p>3.Communication and Training: Grade: Some Improvements Recommended The training is in the charge of Ms. Xiao. It includes the factory's policy of banning the use of sub-contracting and homeworkers. However, among the interviewed employees, the awareness of this procedure is relatively low. At present, there is no documented process to ensure that newly recruited HR staff can receive training in a timely manner.</p> <p>4.Monitoring: Grade: Some Improvements Recommended Evidence collected and implemented through program defined monitoring programs and indicators. Mrs. Xiao is responsible for supervising all collected records. But no record of supervision frequency provided by the Mrs. Xiao.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to
validate this code section**

Current systems:

1. Confirmed by factory management, no sub-contractor was used by the factory.
2. The factory had established social accountability manual include sub-contracting control procedure.
3. No homeworking was identified in the factory.

Evidence examined:

Site tour

Materials in/out records

Interview with management and workers

Social accountability manual

Assessment records

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
The supplier did not purchase products or services from suppliers that use homework.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No unrecorded work or undeclared sub-contracting on site.

Are any sub-contractors used? No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "No harsh or inhumane treatment is allowed"</p> <p>1. Policies and Procedures: Grade: Robust The factory has clear anti - harassment and anti - abuse policies, disciplinary procedures, and internal grievance procedures. The internal grievance procedures clearly state that anonymous complaints and reports can be made through suggestion boxes. Workers can report any grievances (such as harassment, bullying, discrimination, etc.) in these boxes. Any complaints received will be handled by the management, and no retaliation will be taken against the relevant workers. The factory clearly maintains a zero - tolerance attitude towards harassment and abuse in its anti - harassment and anti - abuse policies.</p> <p>2. Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for handling reports and complaints. She has set up a supervision team with the participation of employee representatives to conduct oversight. Moreover, any disciplinary actions against employees are also subject to the fairness supervision of this team. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have been established.</p> <p>3. Communication and Training: Grade: Some Improvements Recommended The training is under the responsibility of the Mrs. Xiao. The prevention of harassment and abuse policy is one of the training contents. However, among the interviewed employees, the awareness of this policy was relatively low, no effective mechanism is in place to ensure the training effectiveness.</p> <p>4. Monitoring: Grade: Some Improvements Recommended Evidence collected and implemented through program defined monitoring programs and indicators. Mrs. Xiao is responsible for supervising all collected records. But no record of supervision frequency provided by the Mrs. Xiao.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
-----------	-----------------------	-----------	---------

No findings

Systems and evidence examined to validate this code section

Current systems:

- 1.The factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- 2.The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past.
- 3.There was an internal process for grievance, which was an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.

Evidence examined:

The relevant policy on prevention of harassment and abuse.
Internal grievance procedure documentation
Training records
Worker and management interview

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	<div>Yes, there is a formal grievance process</div> <div>The grievance process is available to all workers</div>
What type of grievance mechanism(s) are available?	<div>The grievance process is available to all workers, such as suggestion box.</div>
Number of grievances raised in the last 12 months	<div>0</div>
Number of grievances resolved in the last 12 months	<div>0</div>

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for " Environment 2-Pillar"</p> <p>1. Policies and Procedures: Grade: Robust The factory has formulated environmental policies and procedures and retained all environmental documents required by law. Additionally, the factory has established water - and electricity - saving policies to encourage employees to engage in energy conservation and emission reduction. The energy - saving effects are regularly evaluated through an assessment process. Moreover, the factory regularly checks for loopholes in the policies and keeps them updated.</p> <p>2. Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. HR Manager Xiao is responsible for the implementation and inspection of environmental policies, ensuring that the factory's environmental impact complies with laws and regulations. She is also in charge of evaluating the energy - conservation and emission - reduction procedures. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have been established.</p> <p>3. Communication and Training: Grade: Some Improvements Recommended All employees are trained on environmental protection policies and water - and electricity - saving policies. By encouraging employees to save water and electricity, the factory aims to enhance its energy - conservation and emission - reduction effects. Regular retraining sessions are held for all employees to strengthen their environmental protection and energy - saving awareness. During the document review, the factory provided relevant training records and statistical data on water and electricity consumption comparisons. However, the training records of new employees show that the training time is set in the month of employment, instead of them participating in the training in a timely manner.</p> <p>4. Monitoring: Grade: Some Improvements Recommended Mrs. Xiao was responsible for effectively monitoring procedures, taking action when the results require it, or making changes to policies and processes. However, there was a lack of records of Mrs. Xiao monitoring.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current system:</p> <ol style="list-style-type: none"> 1. The factory maintained all legally required environmental documents in place which proved that the production of the factory comply with the related environmental regulations. 2. The factory learned about the environment impact of their site. 3. Based on workers interview, they were trained on environmental protection. 4 The company had policy on environment protection and QC supervisor was appointed to response the compliance of environment requirement. <p>Evidence examined:</p> <ul style="list-style-type: none"> Environmental policy and procedure All legally required environmental documents were provided for review Worker and management interview Registration Form for Sources of Pollution of the Environment Site tour 		

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	NA, the factory has no environmental or energy management certificate.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1. Based on management interview and document review, factory provided Registration Form for Sources of Pollution of the Environment. 2. The factory learned about the environment impact of their site and took continuously management measures to control the environment impact. 3. Based on workers interview, they were trained on environmental protection. 4. The factory management maintained all legally required environmental documents in place which proved that the production of the factory was following the related environmental regulations. 5. The factory had procedure on environment protection and QC supervisor was appointed to response the compliance of environment requirement. <p>Evidence examined:</p> <ul style="list-style-type: none"> Environmental policy and procedure All legally required environmental documents were provided for review Worker and management interview Registration Form for Sources of Pollution of the Environment Site tour 		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Biodiversity and eco system impact management Packaging optimization Circular economy and resource efficiency Responsible use and management of water Sustainable material sourcing Prioritising local suppliers
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes There is a system in place for managing client requirements and legislation in the destination countries regarding environmental and chemical issues. This system ensures compliance with relevant regulations, monitors changes in legal requirements, and aligns the site's operations with international standards.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Water and electricity usage were monitored with reduction targets to reduce costs.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The site had monitored the environmental performance of business partners.

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	1,350,169	16,826,817
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available

Sources of renewable energy used	Data not available	Data not available
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	721,524	3,840,811
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	117,316	124,590
Water discharged	Discharged into the municipal sewer	Discharged into the municipal sewer
Water volume discharged (m3)	46,937	49,836
Water volume recycled (m3)	70,379	74,754
Total waste produced (mt)	52	53
Total hazardous waste produced (mt)	4	4
Waste to recycling (mt)	40	42
Waste to landfill (mt)	0	0
Waste to other (mt)	8	7
Total product produced (mt)	40,100	40,000

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The management system for "Business ethics"</p> <p>1. Policies and Procedures: Grade: Robust The factory has established the "Corporate Business Ethics Policy" and the "Anti - Bribery and Anti - Corruption Policy", clearly stating that bribery and corruption are prohibited in all external and internal communication links of the factory, including procurement and sales. The factory takes a zero - tolerance stance towards employees who violate business ethics. The "Corporate Business Ethics Policy" stipulates that the factory should conduct regular business ethics assessments.</p> <p>2. Resources: Grade: Robust Mrs. Xiao/HR Manager is responsible for the implementation of the business ethics policy and conducts regular evaluations. She is also in charge of handling reports and complaints related to corruption and bribery. In the event of job changes or staff absences, procedures for arranging temporary responsibilities have been established.</p> <p>3. Communication and Training: Grade: Some Improvements Recommended The factory provides training on the "Corporate Business Ethics Policy" and the "Anti - Bribery and Anti - Corruption Policy" to all employees. New employees receive this training during their on - boarding process. Employees are encouraged to report and file complaints about bribery and corruption incidents. Regular retraining sessions are held for all employees to emphasize the factory's zero - tolerance attitude towards bribery and corruption. During the document review, the factory provided relevant training records. However, the training records of new employees show that the training time is set in the month of employment, instead of them participating the training in a timely manner.</p> <p>4. Monitoring: Grade: Some Improvements Recommended Mrs. Xiao was responsible for effectively monitoring procedures, taking action when the results require it, or making changes to policies and processes. However, there was a lack of records of monitoring.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
-----------	-----------------------	-----------	---------

No findings

Systems and evidence examined to validate this code section

Current systems:

- 1.The HR supervisor was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- 2.The company established a business ethics policy which was communicated to workers through posters and training.
3. The site had received and read the Business Ethics policy of the auditor/audit company.
- 4.There was an internal grievance process, which was an anonymous email address.

Evidence examined:

The company business ethics policy
Bribery and Corruption policy
Training records
Worker handbook

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	No certified anti-bribery Management System was available in the factory.

Attachments



[Signed CAPR.pdf](#)



[Photo Form.pdf](#)





For more information visit <https://www.sedex.com>