



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000024683	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000028622	
Business name (Company name):	DAS SOLAR CO LTD			
Site name:	DAS SOLAR CO LTD			
Site address:	No.43, Bailing South Road, Quzhou City 中国浙江省衢州市百灵南路43号 Quzhou 324022 CN	Country:	CN	
Site contact and job title:	Mr. Li Zhenhai / QA Director			
Site phone:	17789445249	Site e-mail:	lifeng.zhang@das-solar.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-03-12			

Audit Company Name:
DNV

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

## Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents  
**2-Pillar SMETA Audit**
  - ETI Base Code
  - SMETA Additions
    - Universal rights covering UNGP
    - Management systems and code implementation,
    - Responsible Recruitment
    - Entitlement to Work & Immigration,
    - Sub-Contracting and Home working,**4-Pillar SMETA**
  - 2-Pillar requirements plus
  - Additional Pillar assessment of Environment
  - Additional Pillar assessment of Business Ethics
  - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

## SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Jerry Xu	APSCA Number:	21702960
Additional Auditors:			
Date of declaration:	2024-03-15		

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

Site Representation	
Full Name:	Mr. Li Zhenhai
Title:	QA Director
Date of declaration:	2024-03-15
Comments:	<p><i>Any exceptions to this must be recorded here (e.g. different sample size):</i>  <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i>  <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i></p>
Nil	

## Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>			0	0	0	
<u>0B - Management systems and code implementation</u>			0	0	0	
<u>1 - Freely chosen employment</u>			0	0	0	
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1	§1 §2 §3 §4	4	0	0	NC - ZAF600400919 NC - ZAF600400920 NC - ZAF600400921 NC - ZAF600400922
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>			0	0	0	
<u>6 - Working hours are not excessive</u>	6.1	§5	1	0	0	NC - ZAF600400923
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>			0	0	0	
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>			0	0	0	
<u>10B4 - Environment 4-pillar</u>	10.B4.1 0		0	1	0	Obs - ZAF600400924
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.
§2	In accordance with GB 26164.1-2010 Safety Code of Electric Power Industry—Part 1: Thermal and Machine, 3.5.5, once power switch shell and wire insulation are incomplete, have damage or live parts are exposed, electrical personnel should repair immediately, otherwise they are not allowed to be used. Damaged power plug and socket are not allowed to be used.

§3	In accordance with GBT 25894-2010 Safety identification — Escape and evacuation plan signs 7.3 Escape plan detail shall incorporate: a) the floor plan of the relevant part of the facility that is modified to eliminate non-essential details, highlight important elements, increase legibility and ease of comprehension, orient the plan to the position of the viewer; b) all emergency exits and escape routes, horizontal and vertical. If directional instructions are to be given from a specific “You are here” point, such directional information shall be conveyed by the use of arrow-type D from ISO 3864-3 (see Figure 1); c) the point of location of the user (“You are here”); d) the location of stairs; e) any specific evacuation provisions made available for people with disabilities; f) the location and type of the first intervention fire equipment and emergency and rescue equipment, e.g. fire alarms, fire extinguisher, fire hoses, first aid equipment; g) the location of the lifts as an architectural feature.
§4	In accordance with Law of the Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) Article 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements 1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place.
§5	In accordance with the China Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty six hours.

## Site Details

Site Details		
Company Name	DAS SOLAR CO LTD	
Site Name	DAS SOLAR CO LTD	
GPS location (if available)	GPS Address:	No.43, Bailing South Road, Quzhou City, Zhejiang Province, China.
	Coordinates:	E 118.871117, N 28.96864
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business licence No.: 91330800MA29URNH1B, Valid from 8 Aug. 2018 to long term	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Solar modules	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The company was established on 8 Aug. 2018, and located at No.43, Bailing South Road, Quzhou City, Zhejiang Province, China. In the audit location, the factory rented five single-storey buildings, three two-storey buildings and one six-storey building. The total floor areas used by the audited factory are 134200 square meters.	

Structure and number of buildings	<b>Building Name:</b>		Production building 1
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Battery workshop	Year of completion: 2019
	2	Office	Year of completion: 2019
	<b>Building Name:</b>		Production building 2
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Warehouse	Year of completion: 2019
	<b>Building Name:</b>		Production building 3
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Warehouse	Year of completion: 2023
	<b>Building Name:</b>		Production building 4
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Solar module workshop	Year of completion: 2023
	<b>Building Name:</b>		Production building 5
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Warehouse	Year of completion: 2023
	<b>Building Name:</b>		Canteen building
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Canteen	Year of completion: 2023
	2	Canteen	Year of completion: 2023
	<b>Building Name:</b>		Production building 6
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Battery workshop	Year of completion: 2023
	2	Office	Year of completion: 2023
	<b>Building Name:</b>		Production building 7
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Chemical warehouse	Year of completion: 2023

	<b>Building Name:</b>		Accommodation building
	<b>Floor</b>	<b>Description</b>	<b>Remark</b>
	1	Dormitory room	Year of completion: 2023
	2	Dormitory room	Year of completion: 2023
	3	Dormitory room	Year of completion: 2023
	4	Dormitory room	Year of completion: 2023
	5	Dormitory room	Year of completion: 2023
6	Dormitory room	Year of completion: 2023	
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: From visual observation, the building was observed in safety conditions and without cracks.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All buildings had been evaluated on the structure safety at the time of completion and the building structure acceptance reports were provided for review.		
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season	Select a month to Select a month		
Process overview	Products being produced: Solar modules, Main production processes: Texturization, phosphorus diffusion, BOE cleaning, coating, printing, sintering, photoinjection, testing, sorting, cutting, laminating, assembling and packing. Main equipment: 8 cutting machines, 16 laminating machines, 8 texturization machines, 4 printing and sintering production lines, 23 series welding machines, 4 BOE cleaning machines, 6 assembling production lines, etc. Production lines: 10 packing lines.		
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None		
Please give details:	There were 79 worker's representatives elected freely by workers in the factory.		
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Are there any on site provided worker accommodation buildings	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: 30% of workers in on site accommodation.
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:

Audit Parameters						
Time in and time out	Day 1		Day 2		Day 3	
	In	09:00	In	08:55	In	08:42
	Out	17:00	Out	16:55	Out	16:42
	Day 4					
	In	08:40				
	Out	12:40				
Audit type:	FULL_INITIAL					
Was the audit announced?	ANNOUNCED					
Was the Sedex SAQ available for review?	No					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	Mr. Li Zhenhai / QA Director					
Is further information available	No					

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

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers - male	149	0	0	471	0	0	0	620
Worker numbers - female	92	0	0	243	0	0	0	335
Total	241	0	0	714	0	0	0	955
Number of Workers interviewed - male	10	0	0	20	0	0	0	30
Number of Workers interviewed - female	3	0	0	9	0	0	0	12
Total - interviewed sample size	13	0	0	29	0	0	0	42

Nationalities Structure	
Nationality of Management	Chinese
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: Chinese      approx %: 100%
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Worker remuneration	Workers on piece rate:      0%
	Paid hourly:      0%
	Salaried:      100%
Payment cycle	Paid daily:      0%
	Paid weekly:      0%
	Paid monthly:      100%
	Other:      0%
	Details for other:      N/A

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	6 groups of 5 workers in each group
Number of individual interviews:	Male: 6 Female: 6
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	No complaints were raised by workers. all interviewed workers were satisfied with the working condition.
What did the workers like the most about working at this site?	All workers said they were satisfied with working condition.
Any additional comment(s) regarding interviews:	None
Attitude of workers to hours worked:	The interviewees verified that they had the choice to decide whether worked OT or not according to the voluntary principle. They wanted more OT hours and premium.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:
<p>The factory had total 955 workers at present. 42 workers were selected for interview as 6 groups of 5 workers in each group and 12 individual workers. The interview was conducted in an independent place. The workers were assured of confidentiality and they spoke freely of their views. All workers were generally satisfied with factory management and working conditions in the factory. The information of interview was as below: •Regarding child labour issue, all interviewees confirmed that the factory checked their ID cards to verify their ages during recruitment. All interviewed workers were not less than 18 years old. •For forced labour issue, the workers confirmed no “deposit” was required and their original documents such as ID cards were kept by themselves, they could leave factory freely after working hours. •Regarding discrimination issue, all interviewees confirmed that no discrimination case occurred in the factory. •For discipline practice issues, the interviewees said they may be orally or written warned, they will be fired when they seriously violate the company's rules and regulations, but no monetary fined if they broke the factory rules. •For safety and health issue, the workers were satisfied with the working condition and the factory provided induction training for new workers and regular safety training to all workers. • For working hour's issues, the normal working hours are 5 days per week and 8 hours per day. Workers rested on all Sundays and holidays. They had the right to refuse overtime work. •Regarding wages issue, the interviewed worker said they could obtain the wages periodically by bank transfer on the 10th of every month. All interviewed workers said they were paid monthly wages. •For OT wages, the interviewees said the factory paid 150% and 200% of normal rate for overtime on weekday and Saturdays respectively, paid 300% of normal rate for overtime in public holiday. Paid legal leaves and maternity leaves were provided to all employees. •For treatment issue, the workers confirmed no harsh or inhumane treatment occurred and the management was kind to all employees. •For freedom of association issue, workers could complain to their supervisors, access to workers' representatives, directly or wrote anonymous letter to the suggestion box or call the telephone of the factory boss. They had good relationships with their supervisors and managers who treated them with respect.</p>
Attitude of worker's committee/union reps:
All worker representatives were satisfied with the working condition, and all employees could give suggestions on all parts of the site's practices.
Attitude of managers:
The factory management was well co-operative during the audit, all the documents & area concerned were open to audit. They showed a willingness to improve all issues found in the audit.

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

**0A: Compliance Requirements**

- 0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
- 0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
- 0.A.3 Businesses shall identify their stakeholders and salient issues.
- 0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
- 0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
- 0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. The factory had a written human rights policy covering human rights impacts and issues, and which was published by the general manager.
2. A senior manager was designated person responsible for implementing standards concerning Human rights.
3. No adverse impact evidence on human rights within any of their stakeholders was detected.
4. Workers could complain or confidentially report to their supervisors or boss, directly or wrote anonymous letter to the suggestion box or call the telephone of the factory boss. Workers had not any fear of reprisals from the factory or involving parties.
5. The factory also communicated the company's human rights policies to stakeholders. The factory has appointed one administrator to receive complaints and suggestions from stakeholders through direct telephone, exclusive email or letter.

**Evidence examined:**

- 1.Human rights policy
- 2.Employee handbook
- 3.Appointment letter of human right representative
- 4.Anonymous grievance records

**Any other comments:**

Nil

Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: The factory published a human rights policy.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: The factory had a human rights policy in the employee handbook.

<p>Does the business have a designated person responsible for implementing standards concerning Human Rights?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory appointed QA director as representative of social responsibility management.</p>				
<p>Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory provided suggestion boxes and hotline numbers to collect complaints from employees and dealing with human rights impacts without fear of reprisals towards the reporter. At the same time, the factory communicated the company's human rights policy to stakeholders, and provided contact information such as email (info@das-solar.com), telephone number (+86- 4008516856) and so on to receive complaints and suggestions.</p>				
<p>Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>				
<p>Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>All employees' information and personnel files were kept by the HR department. Only authorized people could view it.</p>				
<p><b>Measuring Workplace Impact</b></p>					
<p>Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">10.8%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">6.7%</td> </tr> </table>	Last year	10.8%	This year	6.7%
Last year	10.8%				
This year	6.7%				
<p>Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])</p>	<p style="text-align: right;">4.4%</p>				
<p>Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)</p>	<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;">Last year</td> <td style="text-align: right;">0.03%</td> </tr> <tr> <td>This year</td> <td style="text-align: right;">0.02%</td> </tr> </table>	Last year	0.03%	This year	0.02%
Last year	0.03%				
This year	0.02%				
<p>Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month)</p>	<p style="text-align: right;">0.01%</p>				

Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The written accident records indicated that no accident occurred last year.	
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers(((Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

**0B - Management Systems and code Implementation**  
[Summary of Findings]

**0B: Compliance Requirements**

- 0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.B.3 Suppliers are expected to communicate this Code to all employees.
- 0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.
- 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The factory had established policies and written procedures which ensured the site meets in particular freedom of association, discrimination, child labour prohibition and general human rights standards.
- 2.The appointment letter of management representative for management of ETI compliance was also provided for review, one senior manager was responsible for compliance with the Code.
3. Based on management interview, they were familiar with local laws concerning labour standards such as wages, working hours, health and safety and so on.
- 4.ETI Base Code and client specific codes have been communicated to suppliers with supplier notice letter.
- 5.The factory conducted internal audit and management review for its social accountability system before this audit day.
- 6.The factory provided the landlord's property ownership certificates and land certificates.
- 7.The factory obtained the business license and other legal documents to operate the company.
- 8.The factory posted the ETI code on the bulletin board and trained all employees on the ETI code.

**Evidence examined:**

- 1.Employee handbook, written policies and procedure.
- 2.Management representative appointment letter.
- 3.Company manual contained details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- 4.Management interview and worker interview.
- 5.Internal audit and management review report.
- 6.The copies of the ownership certificates and land certificates.
- 7.business license.

**Any other comments:**

Nil

**Management Systems**

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  The site had not been fined in the past 12 months.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Policies exist for Forced labour, Health and Safety, Wage, Working Hours, No harsh treatment, Environment and Business Ethics. Policies exist for Child Labour, Recruitment, Discrimination and Subcontracting.

<p>If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Policies exist for some of these areas (Forced labour, Health and Safety, Wage, Working Hours, No harsh treatment and Business Ethics); these are communicated to workers via poster and training. Through documents review and workers interview, policy on management system, health and safety and environment were in compliance with the code. Workers stated no forced labour, no child labour was found (through interview and document checks), there were both female and male among management/supervisors.</p>
<p>Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The training records were available in the factory.</p>
<p>If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training records: - Training for management/supervisors. - Introductory training record for new employees. - Confirmed via management and worker interview.</p>
<p>Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory obtained ISO 9001 certificate (valid from 26 Sep. 2023 to 14 Apr. 2025, Certificate No.: 4410019880020), ISO 14001 certificate (valid from 12 Jul. 2023 to 14 Mar. 2026, Certificate No.: 4410420880006) and ISO 45001 certificate (valid from 12 Jul. 2023 to 14 Mar. 2026, Certificate No.: 4412620880006).</p>
<p>Is there a Human Resources manager/department?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The factory HR manager was in charge of HR management.</p>
<p>Is there a senior person /manager responsible for implementation of the code?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The QA director was responsible for implementation of the Code.</p>
<p>Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had a policy to ensure workers' information is confidential, such as for workers' ID copy, address and contact information, etc.</p>
<p>Is there an effective procedure to ensure confidential information is kept confidential?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All confidential information including personnel files was locked away in the HR department and only viewed by the top manager and authorized personnel.</p>

<p>Are risk assessments conducted to evaluate policy and procedure effectiveness?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory had a few of written risk assessment procedures and records such as Job analysis records for pregnant women, PPE requirements analysis.</p>
<p>Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory developed risk management procedures, conducted post risk assessments, and took control measures for potential high risks.</p>
<p>Does the facility have a policy/code which require labour standards of its own suppliers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory has established the supplier policy, including the labor standards that the supplier should follow.</p>
<p><b>Land Rights</b></p>	
<p>Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory provided the landlord's ownership certificates and land certificates.</p>
<p>Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory had established investigation procedures on the legality of land use, and the factory was not found to have violated national laws and regulations on land.</p>
<p>Does the site have a written policy and procedures specific to land rights?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>N/A</p>
<p>Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>As per local laws, the state owns all land in China. The building was allowed to be built only obtaining the planning permit.</p>
<p>Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The owner obtained the planning permits and house proprietary certificates from local authority department.</p>
<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>No negative evidence was detected.</p>

**1 - Freely chosen Employment**  
**[Summary of Findings]**

**1: Compliance Requirements**

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The factory had a policy which prohibited forced labour and this was available for review.
- 2. There was a procedure stated that employees must present their ID cards for proof of age, but that only copies must be kept in the personnel files and the original given back to the workers.
- 3. The employee handbook was given to all workers on joining, stated that employees within their probation period were free to leave with 3 days written notice and once a worker was permanent (this was out of probation), they could resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also stated that they would be given their full wages on their last day of work.
- 4. The managements did not prohibit workers from leaving the premises outside of working hours. Overtime was voluntary.
- 5. No wage deductions, any deposits or withholdings were identified based on the review of the payrolls.
- 6. The recruitment procedure stated that they could not recruit prison workers, compulsory overtime was prohibited, and employees can report threats, intimidation and abuse to management.
- 7. The factory signed the labor contract with its employees, the labour contract did not have abusive items.
- 8. The HR department of the factory recruited employees independently, and employees did not need to pay the recruitment fee.
- 9. Workers were not forced to work through the use of threats, intimidation or physical abuses.

**Evidence examined:**

- 1. Social accountability policy and manual
- 2. Employee handbook
- 3. Recruitment procedure
- 4. Personnel files and labour contracts
- 5. Payroll records
- 6. Resignation records
- 7. Interview with management and workers
- 8. Site tour
- 9. Labour contracts

**Any other comments:**

Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

<p>Are there any restrictions on workers' freedom to terminate employment?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: There were no restrictions on employee termination.</p>
<p>If any part of the business is UK based or registered there &amp; has a turnover over £36m, is there a published a 'modern day slavery statement'?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details: The factory was not registered in the UK or has a branch in the UK.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: There was no evidence that workers will be barred from leaving at the end of the work day.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details: The factory established the written policy on prohibition of forced/Trafficked/Bonded labour in its supply chain. No forced / trafficked / bonded labour was detected in its supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The factory conducted an annual social responsibility assessment of the supplier.</p>

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

**2: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The written policy on freedom of association showed that workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 2.There was no union at the site.
- 3.There was evidence of 79 worker's representatives elected freely by workers.
- 4.Employees understood collective bargaining rights but have no plans to conduct the collective bargaining with the company.

**Evidence examined:**

- 1.The policy on freedom of association and right to collective bargaining.
- 2.Social accountability manual included worker representative selection program and the responsibility of the worker representative.
- 3.Interview with workers.
- 4.Interview with management.
- 5.Free election record.

**Any other comments:**

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	There were 79 worker's representatives elected freely by workers in the factory.
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details: Workers could raise their concerns through telephone, suggestion box, directly communicating with the factory management.
Is there evidence of free elections?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The worker's representative could use any free rooms to meet workers freely.
Name of union and union representative, if applicable:	N/A
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	79 worker representatives were elected by the workers themselves.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory posted the information of the employee representatives on the bulletin board
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2021-08-19
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The last communication meeting was held on 12 Dec. 2023 with topic of working condition and lasting about 1.5 hours.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

**3: Compliance Requirements**

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

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

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

### 3.1 Management system

- The factory provided pre-job occupational health training and regular on-job occupational health training for employees and disseminated occupational health and safety knowledge.
- Health & safety policy was established, and the factory managers were familiar with it.
- One senior management was appointed as Health & Safety Manager for the site.
- There was a health and safety committee at the site. The H&S committee met workers quarterly.
- H&S Risk assessments were conducted.
- The factory has conducted effective risk assessment to ensure the safety of all types of workers, e.g. pregnant and lactating women, young workers, migrant workers.

### 3.2 Personal Protective Equipment (PPE)

- The factory provided training records on the use of PPE.
- All PPE was provided free of charge to employees, who can replace the used PPE as defined frequency or broken.
- The factory provided suitable PPE for employees who exposed to hazards, but two laminating operators did not wear earplugs when working.

### 3.3 Emergency response/ First aid/ Accidents

- Forty-six employees attended the Red Cross first aid training and obtained the certificates of first responder.
- The factory signed the medical treatment agreement with one local hospital.
- The factory offered pre-job fire safety training for employees and organized fire safety training and fire protection drilling. The latest fire drill was conducted on 16 Jan. 2024.
- There were at least 2 exits at each work floor, the exits were clearly marked except for the chemical warehouse. All exits were unbarred and unlocked.
- All evacuation aisles were clear and unblocked and its width was enough.
- The factory kept the records of work-related injury; no accident or injury had occurred up to the audit date.
- The factory established an emergency plan, including mechanical injury, fire accident, high temperature, traffic accident, electric shock, chemical leakage, environmental pollution, natural disaster and so on.

### 3.4 Electrical safety

- Ten electricians were available at the site and the qualification certificates were provided for review, they regularly inspected the electrical safety of the factory.
- Most electrical equipment such as sockets, plugs, switches and main fuse boards were maintained in good condition. But one electrical control panel in the packing workshop was not equipped with outer cover.

### 3.5 Fire safety

- Fire equipment (e.g. hydrants, extinguishers) and evacuation facilities were equipped at each floor.
- Firefighting facilities were inspected once every month, and check records were available.
- There were designated fire fighters at each workplace.

### 3.6 Machinery

- All production machines were under safety conditions.
- The equipment management personnel regularly maintained the equipment and kept the maintenance records.

### 3.7 Building safety

- The factory had the reports of acceptance check for construction completion and the acceptance inspection reports of fire protection system for its buildings.
- All buildings were observed in safety conditions and without cracks.

### 3.8 Hygiene

- The kitchen was clean and sanitary, the food service permit was granted by the local Market Supervision and Administration, the food operators held the valid health certificates.
- Lavatory facilities were accessible and adequate in number and segregated for men and women. Washbasins and water taps were available and adequate.

### 3.9 Chemicals

- There were detergent, ethyl alcohol, sodium hypochlorite and lubricating oil used in the factory. MSDSs were available at the places where the chemicals were stored and used.
- The factory provided training on chemical safety to employees.

### 3.10 Worker health

- Drinking water was provided free of charge to workers.
- The workshop had ventilation equipment, lighting, temperature, were appropriate.
- Employees understood the occupational hazard risks of their posts.
- All the employees who exposed to occupational hazardous agents have undergone occupational health examination.

### 3.11 Accommodation

- The factory provided the accommodation, there were the separate bathroom with hot water in each room.

<ul style="list-style-type: none"> <li>- The dormitory was equipped with private lockers that can be locked.</li> <li>- The dormitory building was a separate building away from the workshop.</li> </ul>
<p><b>Evidence examined:</b></p> <ul style="list-style-type: none"> <li>-Health and safety policy and procedures;</li> <li>-Health and safety manual;</li> <li>-Health and safety meeting minutes;</li> <li>-Training records and certificates;</li> <li>-Relevant licenses issued by the government agencies;</li> <li>-Fire equipment maintenance records;</li> <li>-Fire drill and evacuation records;</li> <li>-The copies of the reports of acceptance check for construction completion;</li> <li>-The copies of the fire safety certificates;</li> <li>-First aider certificates;</li> <li>-Check records on fire equipment;</li> <li>-Accident management procedure and blank injury log;</li> <li>-PPE issuance list;</li> <li>-Chemical list;</li> <li>-Chemicals' MSDSs;</li> <li>-Potable water testing report</li> <li>- The food service permit and health certificates</li> <li>-The occupational health examination reports;</li> <li>-Interview with H&amp;S manager;</li> <li>-Interview with workers;</li> <li>-Site tour.</li> </ul>
<p><b>Any other comments:</b></p>
<p>Nil</p>

<p>Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory has established health and safety policies and procedures; there was a health and safety committee at the site. The H&amp;S committee met workers quarterly.</p>
<p>Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The worker's manual included the factory's recruitment policy, salary and benefits, EHS policy, etc.</p>
<p>Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory did not alter the structure of the building.</p>
<p>Are visitors to the site informed on H&amp;S and provided with personal protective equipment?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>H&amp;S policy and safety attention were informed to visitors. The factory provided clothes, masks and earplugs to the visitors.</p>
<p>Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined &amp; relevant comments. Include renewal/expiry date where appropriate))</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>There was no medical room provided for workers, no applicable legal requirement for the site.</p>

<p>Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Doctor or nurse is not necessary on site. There were 46 qualified first aiders easily accessing on site.</p>
<p>Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Because employees lived near the factory, there is no need for transport.</p>
<p>Is secure personal storage space provided for workers in their living space and is fit for purpose?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The factory provided private lockers for each employee living in accommodation.</p>
<p>Are H&amp;S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>H&amp;S Risk assessments were conducted. E.g. Cutting workers were at risk of being cut, and the factory has provided PPE and trained them to reduce the risk.</p>
<p>Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>Refer to 10B4 section.</p>
<p>Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The site has a copy of the banned substances list from its customer and met those requirements.</p>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600400919	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that two laminating operators did not wear earplugs when working, although these PPE had been provided by the factory.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that facility should provide appropriate PPE and supervise and train employees to properly use the PPE.	
		 <a href="#">NC1-No PPE.JPG</a>

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600400920	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	224 - Isolated occurrence of incorrect / damaged insulation in electricals including burnt / damaged wiring and plugs	
Subcategory	Electrical risk	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with GB 26164.1-2010 Safety Code of Electric Power Industry—Part 1: Thermal and Machine, 3.5.5, once power switch shell and wire insulation are incomplete, have damage or live parts are exposed, electrical personnel should repair immediately, otherwise they are not allowed to be used. Damaged power plug and socket are not allowed to be used.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted through factory tour that one electrical control panel in the packing workshop was not equipped with outer cover.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that all electrical control panels should be installed with outer cover and maintained in good condition.	
		 NC2-No outer cover.JPG



Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600400921	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	216 - No / inadequate fire assembly point (e.g. too small for the number of employees, situated in an unsuitable location etc.)	
Subcategory	Fire Safety - Fire alarms & Evacuation	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with GBT 25894-2010 Safety identification — Escape and evacuation plan signs 7.3 Escape plan detail shall incorporate: a) the floor plan of the relevant part of the facility that is modified to eliminate non-essential details, highlight important elements, increase legibility and ease of comprehension, orient the plan to the position of the viewer; b) all emergency exits and escape routes, horizontal and vertical. If directional instructions are to be given from a specific “You are here” point, such directional information shall be conveyed by the use of arrow-type D from ISO 3864-3 (see Figure 1); c) the point of location of the user (“You are here”); d) the location of stairs; e) any specific evacuation provisions made available for people with disabilities; f) the location and type of the first intervention fire equipment and emergency and rescue equipment, e.g. fire alarms, fire extinguisher, fire hoses, first aid equipment; g) the location of the lifts as an architectural feature.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that the evacuation assembly points were not marked on the evacuation plan of all buildings.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
		 NC3-Incorrect evacuation plan.JPG

Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the evacuation assembly points should be indicated on the evacuation plan of all buildings.	

Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600400922	
Clause	3 - Working Conditions are Safe and Hygienic	
Issue Title	209 - Not all emergency exits are properly marked and lighted	
Subcategory	Fire Safety - Fire exits	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input checked="" type="checkbox"/> Other	
Root cause - Other	Leak of safety awareness	
Local law issue	In accordance with Law of the Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) Article 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements 1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	It was noted that 2 safety exits in the chemical warehouse missed emergency lights and 'EXIT' signs.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the site should ensure all safety exits installed with emergency lights and 'EXIT' signs, and check it regularly.	
		 NC4-Missed emergency lights and 'EXIT' signs.JPG

--	--

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

**4: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The factory evaluated the risks of child labour for its sector and country, established the recruitment procedure on prohibiting child labour.
- 2.All employees should be only hired by the admin department of the factory but not by any other department.
- 3.Based on the management interview, employees' ID and photo should be checked at the point of recruitment. The employee without valid ID certificate should not be hired.
- 4.The factory established child labour remediation procedure. No child labour was found during the audit.
- 5.The factory has established the protection procedures for young workers. During this audit, it was not found that the factory used young workers.
- 6.The personnel in charge of recruitment were trained and aware of the risks.
- 7.Based on documents review, there was no child labour in the factory. The youngest worker identified was 19 years old currently who was born on 15 Sep. 2004 and entered the factory on 1 Mar. 2024.

**Evidence examined:**

- 1.Recruitment procedure.
- 2.Child labour remediation procedure.
- 3.protection procedures for young workers.
- 4.Latest employee list.
- 5.Personnel files of all workers.
- 6.Interview with management and workers
- 7.Site tour

**Any other comments:**

Nil

Legal age of employment:	16
Age of youngest worker found:	19
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  No

**5 - Living Wages are Paid**  
**[Summary of Findings]**

**5: Compliance Requirements**

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The factory established the wages and benefits management procedure, wages were paid on time accurately and according to legislation.
- 2.Local minimum wage standards: RMB 2010/month (RMB 11.55/hr) since 1 Jan. 2024, and RMB 1840/month (RMB 10.57/hr) before 1 Jan. 2024.
- 3.Payroll records from Mar. 2023 to Feb. 2024 were provided by the factory for checks. All workers were paid monthly wages, and the minimum wages were not less than RMB 2700 per month (RMB 15.52/hr) for normal working hours.
4. All eligible employees participated in Medical Insurance, Endowment Insurance, Unemployment Insurance, Maternity Insurance and Work-related Injury Insurance, and the factory had provided commercial accident insurance for all retirees.
- 5.The factory paid 150% and 200% of regular rate for regular overtime hours and weekend overtime hours respectively. No overtime work in statutory holidays.
- 6.All workers were paid on the 10th of every month by bank transfer and each worker was given a pay slip.
7. Workers understood their wages, including clear contractual clauses, time recording systems and payslips
- 8.The factory had provided annual leaves, breastfeeding leave and maternity leave and so on for workers according to the benefit policy.
- 9.The employees who violated the factory rules would be warned, gigged or fired, no monetary fine for disciplinary purpose.

**Evidence examined:**

- 1.Wages and benefits policy and procedure
- 2.Employee manual.
- 3.Local legal min wage documents.
- 4.Payroll records and corresponding attendance records;
- 5.Labour contracts for all workers.
- 6.Resignation records.
- 7.Production records;
- 8.Social insurance payment receipts
- 9.Worker interview and management interview

**Any other comments:**

Nil

**Summary Information**

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?

Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 184.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 60.0 Per Month: 88.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 2010	Actual Per Day: 124 Per Week: 621 Per Month: 2700	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0 Per Week: 0 Per Month: 0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	42 samples in Apr. 2023 (Random month) 42 samples in Aug. 2023 (Random month) 42 samples in Feb. 2024 (Recent month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	RMB 15.52/hr, RMB 621/week, RMB 2700/month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 0.0% of workforce earning minimum wage 100.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: No bonus was found. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, personal tax deductions were required by law.		
Have these deductions been made?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Please list all deductions that have been made.	Social insurance		
Please list all deductions that have not been made.	Personal tax deductions		

Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All relevant working hours are recorded.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There was a timely review when local minimum wage standard was adjusted.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through factory rules review, payroll records review and employee's interviews, it was confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

**6 - Working Hours are not Excessive**  
**[Summary of Findings]**

**6: Compliance Requirements**

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1. All workers used electronic time recording machine to record their working hours.
- 2. The factory's attendance system accurately recorded employees' working hours, and employees could report to the admin department if the time records are wrong.
- 3. The attendance records from 1 Mar. 2023 to the audit date (12 Mar. 2024) were provided and samplings were checked during this audit.
- 4. The working hour policy, labour contracts, etc. indicated that the regular working hours at the factory were 8 hours per day and 5 days per week.
- 5. The factory arranges the production in accordance with the clients' orders, so there was no fixed peak or non-peak month.
- 6. Based on facility rule and workers interview, there were three shifts in the facility, the workshop had two shifts, one shift from 08:00 to 20:00 with 2.0 hours break time, another shift from 20:00 to 08:00 with 2.0 hours break time, the shift for the supporting staffs and office staffs was from 08:30 to 17:30 with 1.0 hour lunch break time from 12:00 to 13:00.
- 7. All the employees in workers interview stated that they worked overtime on voluntary basis.
- 8. The maximum weekly working hours were 60 hours.
- 9. The maximum overtime hours were 2 hours per working day, 20 hours per week and 88 hours per month.
- 10. All workers had one day off in seven days.
- 11. Through the workers interview and document review, all production records, leave records and information obtained from the interview were consistent with the provided attendance records.
- 12. The factory established working hours and overtime management procedures that ensure working hours meet the international labour standards and national regulation. However, the employee's monthly overtime was still exceeding the legal limit.

**Evidence examined:**

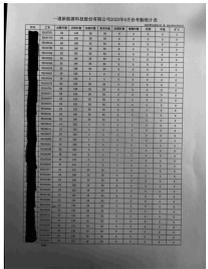
- 1. Factory policy on working hours
- 2. Local and national laws
- 3. Workers contracts
- 4. Attendance records
- 5. Computerised time logging system
- 6. Production and quality records to cross check hours
- 7. Working hours and overtime management procedures
- 8. Management interview and worker interview

**Any other comments:**

Nil

Working hours' analysis	
<b>Systems &amp; Processes</b>	
What timekeeping systems are used?	Electronic attendance system
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Apr. 2023 (Random): 2 hours per working day, 20 hours per week, 88 hours per month; Aug. 2023 (Random): 2 hours per working day, 20 hours per week, 86 hours per month; Feb. 2024 (Current): 2 hours per working day, 20 hours per week, 28 hours per month.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A



Non-Compliance		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Non-Compliance</b>		
Status	OPEN	
Reference	ZAF600400923	
Clause	6 - Working Hours are not Excessive	
Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive	
Subcategory	Overtime	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	In accordance with the China Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty six hours.	
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	
Explanation to the non compliance	Overtime hours exceeded the legal requirement of 36 hours per month. According to the attendance records of 3 sample months, it was noted that 31 out of 42 sample workers worked 86-88 overtime hours in Apr. 2023, 31 out of 42 sample workers worked 86 overtime hours in Aug. 2023.	
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should ensure the overtimes of workers in accordance with the legal requirements and ETI code. The maximum overtime hours did not exceed 3 hours a day and 36	
		 <a href="#">NC5-Overtime work.JPG</a>

	hours a month.	
--	----------------	--

**7 - No Discrimination is Practiced**  
**[Summary of Findings]**

**7: Compliance Requirements**

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The Anti-discrimination policy and social accountability manual has been established by the factory.
- 2.One senior manager was responsible for the management of this item of the code.
- 3.The factory provided the same pay to male/female employees, if they engaged for the same work.
- 4.All interviewees stated they were treated fair despite of their native place, sex, age and so on. And they did not experience and never heard of reporting issues of discrimination.
- 5.There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
- 6.No worker was required to do the examination of the hepatitis B virus and HIV.
- 7.There was no evidence of sexual harassment.
- 8.In case of discrimination, employees can complain to management through employee representative, suggestion box, telephone, email, etc.

**Evidence examined:**

- 1.Anti-discrimination policy and social accountability manual
- 2.The hiring and termination procedure leave application records and employee handbook
- 3.Attendance records.
- 4.Payrolls.
- 5.Training records
- 6.Termination records
- 7.complaint/appeal records.
- 8.Interview with management and workers

**Any other comments:**

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 84.0%	Female: 16.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	120	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring  <input type="checkbox"/> Promotion	<input type="checkbox"/> Compensation  <input type="checkbox"/> Termination or retirement
		<input type="checkbox"/> Access to training  <input checked="" type="checkbox"/> No evidence of discrimination found
Please give details	N/A	
<b>Professional Development</b>		
What type of training and development are available for workers?	Workers were given H&S training, equipment operation training, first aid training, etc.	

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

Yes  No

**8 - Regular Employment Is Provided**  
[Summary of Findings]

**8: Compliance Requirements**

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

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

**Additional Elements: Responsible Recruitment**

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.All employees were recruited by the factory directly. No labor agency was used to hire workers.
- 2.There was no temporary worker, apprenticeship scheme or home worker was identified during this audit.
- 3.The factory signed labor contracts with all employees on the first day of employment and kept one copy of labor contract in the factory and issued one copy to each worker.
- 4.The factory established the recruitment procedure, workers understood their terms of employment.

**Evidence examined:**

- 1.Recruitment policy and procedure
- 2.The hiring and termination practices
- 3.Personal files and labour contracts
- 4.Payroll records
- 5.Interview with management interview and workers

**Any other comments:**

Nil

**Responsible Recruitment**

**All Workers**

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	<input checked="" type="checkbox"/> Terms & Conditions presented	<input checked="" type="checkbox"/> Understood by workers
	<input checked="" type="checkbox"/> Same as actual conditions	

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
---	---

Migrant Workers	
Type of work undertaken by migrant workers:	All types of works could be taken by migrant workers.
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Is there any observation on this finding?	No
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 216 migrant workers in skilled, technical or management roles.
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The factory did not use contractor workers.



**8A - Sub-Contracting and Homeworking**  
**[Summary of Findings]**

**8A: Compliance Requirements**

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.The factory has established subcontractor management procedures, there was no home worker found during this audit.
- 2.If the client's products need to be subcontracted, the factory would inform the client, no inconsistent evidence was detected regarding this section.
- 3.Based on the site tour, the factory had all kinds of equipment to produce customers' products, all the production processes were on site.
- 4.By checking the production records, quality records, warehouse records and order information, no subcontractor was used by the factory.

**Evidence examined:**

- 1.List of approval supplier and sub-contractors
- 2.Production records
- 3.Quality records
- 4.Warehouse records
- 5.Customer orders
- 6.Interview with management and workers
- 7.Site tour

**Any other comments:**

Nil

**Summary of sub-contracting – if applicable**

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

**Summary of homeworking – if applicable**

Is homeworking used at this site?     Yes     No



<p>Please provide grievance mechanism details</p>	<p>Employees could raise their grievances directly to supervisors, worker representatives, or put letters in suggestion box to state their opinions and suggestions, and then the management would post corresponding feedback on the bulletin board. External stakeholders could raise their grievances through the company's public contact information, such as phone and email, the management of the company will deal with it timely.</p>
<p>Are there any open disputes?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>
<p>Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Is there a published and transparent disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>If yes, are workers aware of these the disciplinary procedure?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:</p>
<p>Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:</p>

**10A - Entitlement to Work and Immigration**  
**[Summary of Findings]**

**10A: Compliance Requirements**

- 10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.
- 10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.As per document review, management and workers interview, no employment agency was used by the factory.
- 2.The factory recruited the new workers directly by the advertisements, employees' recommendation and recruitment fair.
- 3.All workers in the factory were Chinese. The migrant workers only came from other provinces.
- 4.All workers had the proper legal rights to work in this region.
- 5.No agency staff or foreign worker was found during this audit.

**Evidence examined:**

- 1.Hiring procedure.
- 2.Worker handbook
- 3.Personal files and contracts
- 4.Interview with management and workers

**Any other comments:**

Nil

**10B4 - Environment 4–Pillar**  
**[Summary of Findings]**

**10B4: Compliance Requirements**

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

10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

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

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

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

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

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

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

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

**10B4: Guidance for Observations**

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

10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

**Current Systems and Evidence Examined**

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

**Current Systems:**

1.The factory established the written environmental policy, manual and a series of procedures.  
 2.The factory had legally required environmental documents: including the construction project environmental impact assessment report, the official approval for the environmental impact assessment (EIA), the environmental protection acceptance check approval for their construction project and the Pollutant Discharge Permit.  
 3.The main waste discharged from the factory were waste metal, waste solar panel, waste gas, living wastewater, industrial wastewater, hazardous waste and packing material. The disposal records were available.  
 4.The factory had a wastewater treatment station, industrial wastewater was treated and met the local discharge legal limit before discharged to the municipal pipe network.  
 5. The factory had installed waste gas collection and purification devices, and waste gas emissions meet national standards.  
 6.The factory had provided environment training for relative management and workers per year and kept relative training records.  
 7.General manager was responsible for co-ordinating the site's efforts and continuous improvements in their environmental performance. The factory EHS supervisor was responsible for environment management.  
 8.The factory EHS supervisor understood local environment laws and regulations.  
 9.The factory EHS supervisor understood the end client's environmental standards/code requirements according to interview.  
 10.The factory had established an environmental policy, covering their environmental impact, which was communicated to all appropriate parties, including its own suppliers.  
 11.The factory was not subjected to any fines/prosecutions for non-compliance to environmental regulations.  
 12.Based on observation on site, management interview and document review. Hazardous waste was disposed by a qualified unit.  
 13. The factory established environmental management procedures and an environmental management committee to implement the control measures on environment protection.  
 14. The factory commissioned a qualified agency to monitor its emissions of environmental pollutants, kept the monitoring reports for review. Monitoring data showed that the factory's pollutant discharge met the relevant national standards.

**Evidence examined:**

1.Environment policy, manual & procedures.  
 2.Waste handling records  
 3.Training records  
 4.Energy bills and water bills  
 5.Hazardous waste entrust disposal contract, transfer records and the permit for hazardous waste proceeding  
 6.EIA report, the official approval for the EIA, the environmental protection acceptance check approval for their construction project and the Pollutant Discharge Permit  
 7.Monitoring data  
 8.Management interview and worker interview  
 9.Site tour

**Any other comments:**

Nil

**Environmental Analysis**

Is there a manager responsible for Environmental issues (Name and Position):	Ms. Chen Yan/EHS Supervisor
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had identified the environmental factors and took corresponding measures to deal with them.

Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had the ISO 14001 certificate (valid from 12 Jul. 2023 to 14 Mar. 2026, Certificate No.: 4410420880006).
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had committed to focus on key impacts and maintained continuous improvement.
Does the site have a Biodiversity policy?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The factory did not have other sustainability systems.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had the construction project environmental impact assessment report, the official approval for the environmental impact assessment (EIA), the environmental protection acceptance check approval for their construction project and the Pollutant Discharge Permit.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The factory had established management procedures for hazardous chemicals, maintained records of chemical use and disposal, etc.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established procedures for the collection of laws and regulations, and continuously updated environmental and chemical regulations in the customer's home country.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established reduction targets for environmental aspects e.g. water consumption and discharge, waste, energy and greenhouse gas emissions.
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Refer to the Usage/Discharge analysis sheet.

Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had established environmental resource management procedures and collected data on resource consumption and waste discharge. The detail data of water and power provided by the factory. Refer to the blow sheet.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory regularly evaluates suppliers' environmental performance.	
Usage/Discharge analysis		
Criteria	Previous year: 2023	Current year: 2024
Electricity Usage: Kw/hrs	399795400	60258000
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Local water authority	Local water authority
Water Volume Used	2791587	479506
Water Discharged	Municipal pipe	Municipal pipe
Water Volume Discharged	671500	115000
Water Volume Recycled	2100000	360000
Total waste produced	12410 T	2220 T
Total hazardous waste produced	114 T	17 T
Waste to recycling	3500 T	630 T
Waste to landfill	0	0
Waste to other	8796 T	1573 T
Total Product Produced	2957 MW	270 MW

Observation		Evidence
<a href="#">[Back to findings summary]</a>		
<b>Observation</b>		
Status	OPEN	
Reference	ZAF600400924	
Clause	10B4 - Environment 4-Pillar	
Issue Title	610 - Environmental section of the Sedex SAQ not completed	
Subcategory	General Environmental Permits, & Management systems	
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	10.B4.10 - Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.	
Explanation to the observation	The factory did not complete the SAQ at the time of audit.	
Actions	It is recommended that the facility should complete the SAQ in time.	

**10C - Business Ethics – 4-Pillar Audit**  
**[Summary of Findings]**

**10C: Compliance Requirements**

- 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
- 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
- 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
- 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
- 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.
- 10C: Guidance for Observations
- 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
- 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

**Current Systems and Evidence Examined**

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

**Current Systems:**

- 1.A senior manager 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 met national regulations / law concerning the relative standards.
- 3. The business ethics policy was communicated to workers through posters and training.
- 4.The site had received the Business Ethics policy of the auditor/audit company.
- 5.There was an internal grievance process, and there was a suggestion box sited in the workshop.
- 6.The factory also communicated the company's business ethics policies to stakeholders. The factory has appointed one administrator to receive complaints and suggestions from stakeholders through direct telephone, exclusive email or letter.
- 7.No integrity case was detected during this audit.
- 8.The factory was not subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations.

**Evidence examined:**

- 1.The company business ethics policy;
- 2.Position description
- 3.Training records
- 4.Worker handbook
- 5.Interview with management and workers
- 6.Supplier list
- 7.Complaint/appeal/grievance record

**Any other comments:**

Nil

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy <input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details: The factory had established the business integrity policy according to national regulations / law concerning the relative standard.</p>
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: Training provided to all employees in Jan. 2024.</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: It was stipulated in the management review procedure of the company that the company shall evaluate whether the company's social responsibility policy needs to be updated in the annual management review.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details: The factory had conducted social responsibility assessment of their suppliers, and the evidence shows that the suppliers had been training in business ethics.</p>

## Attachments



The canteen building.JPG



The working attendance machine.JPG



Toilet.JPG



The finished goods warehouse.JPG



The material warehouse.JPG



Production building 5.JPG



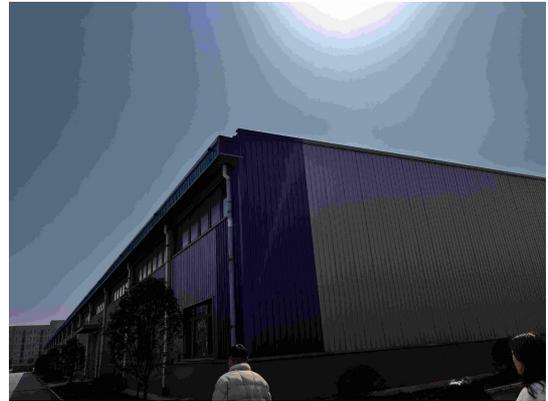
Testing process.JPG



Production building 4.JPG



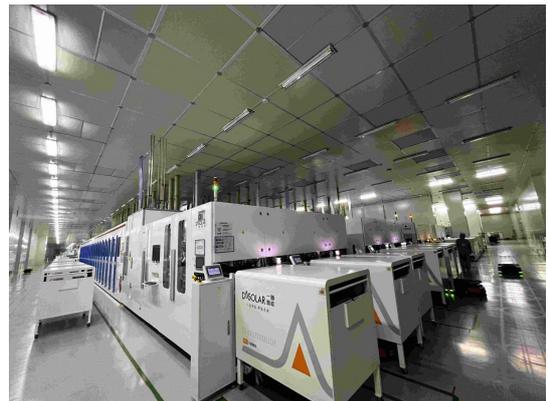
Production building 1.JPG



Production building 2.JPG



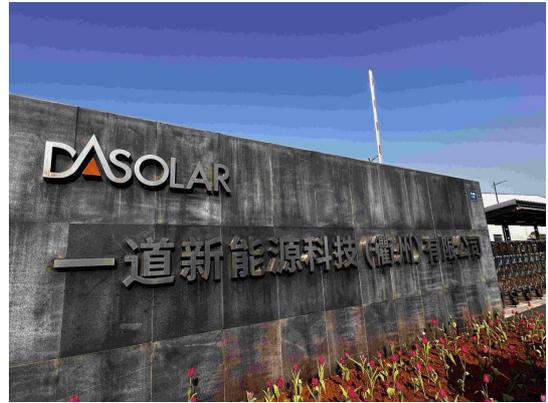
Packing workshop.JPG



Texturization process.JPG



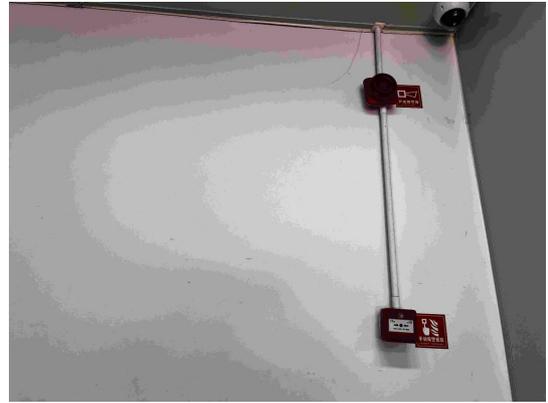
Fire fighting facilities.JPG



Factory nameplate.JPG



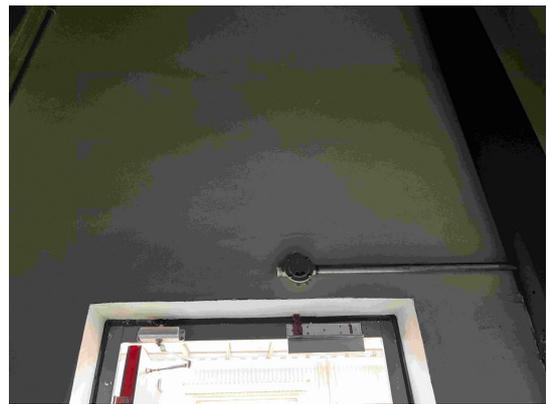
Production building 6.jpg



Fire alarm.JPG



NC3-Incorrect evacuation plan.JPG



NC4-Missed emergency lights and 'EXIT' signs.JPG



NC2-No outer cover.JPG



NC1-No PPE.JPG



Emergency light and Exit sign.JPG



Suggestion box.jpg



Production building 3.JPG



Accommodation building.JPG



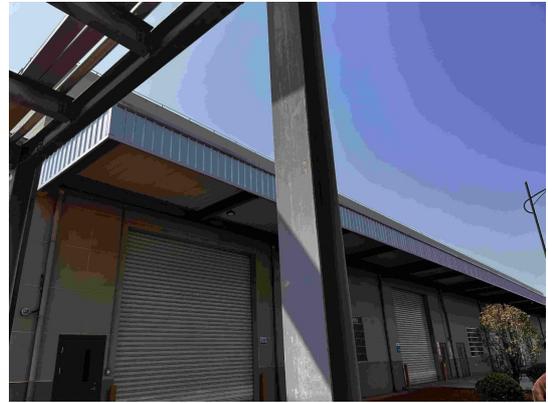
Eye wash station.JPG



Dormitory.JPG



Phosphorus diffusion process.JPG



The chemicals warehouse.JPG



Sorting process.JPG



Drink water.JPG



Printing, sintering process.JPG



Assembling process.JPG



First aid kit.JPG

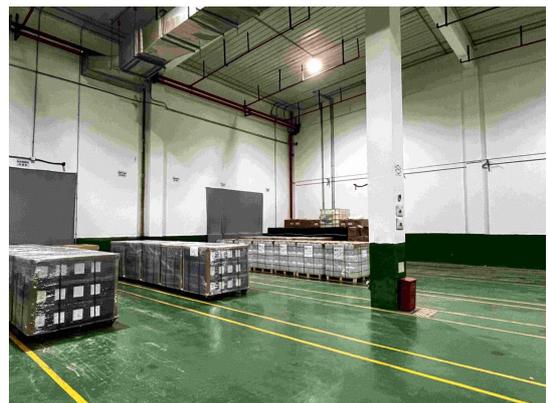
一德新能源科技股份有限公司2023年4月份考勤统计表

姓名	工号	日期	出勤	迟到	早退	请假	加班	备注
王明	1001	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1002	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1003	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1004	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1005	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1006	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1007	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1008	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1009	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1010	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1011	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1012	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1013	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1014	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1015	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1016	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1017	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1018	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1019	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1020	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1021	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1022	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1023	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1024	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1025	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1026	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1027	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1028	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1029	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1030	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1031	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1032	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1033	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1034	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1035	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1036	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1037	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1038	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1039	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1040	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1041	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1042	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1043	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1044	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1045	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1046	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1047	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1048	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1049	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1050	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1051	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1052	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1053	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1054	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1055	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1056	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1057	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1058	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1059	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1060	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1061	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1062	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1063	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1064	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1065	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1066	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1067	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1068	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1069	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1070	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1071	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1072	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1073	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1074	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1075	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1076	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1077	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1078	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1079	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1080	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1081	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1082	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1083	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1084	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1085	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1086	04-01	08:00	00:00	00:00	00:00	00:00	
张华	1087	04-01	08:00	00:00	00:00	00:00	00:00	
赵伟	1088	04-01	08:00	00:00	00:00	00:00	00:00	
孙磊	1089	04-01	08:00	00:00	00:00	00:00	00:00	
周敏	1090	04-01	08:00	00:00	00:00	00:00	00:00	
吴昊	1091	04-01	08:00	00:00	00:00	00:00	00:00	
郑宇	1092	04-01	08:00	00:00	00:00	00:00	00:00	
冯涛	1093	04-01	08:00	00:00	00:00	00:00	00:00	
陈鑫	1094	04-01	08:00	00:00	00:00	00:00	00:00	
褚文	1095	04-01	08:00	00:00	00:00	00:00	00:00	
曹宇	1096	04-01	08:00	00:00	00:00	00:00	00:00	
林强	1097	04-01	08:00	00:00	00:00	00:00	00:00	
罗伟	1098	04-01	08:00	00:00	00:00	00:00	00:00	
宋宇	1099	04-01	08:00	00:00	00:00	00:00	00:00	
李强	1100	04-01	08:00	00:00	00:00	00:00	00:00	

NC5-Overtime work.JPG



Coating process.JPG



Chemicals.JPG



BOE cleaning process.JPG



Canteen.JPG



Cutting and laminating process.JPG



Business license.png



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

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

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

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

[http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\\_2brg\\_3d\\_3d](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d)

**[Click here for Auditors:](#)**

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