

# Sedex Members Ethical Trade Audit Report



	Au	Jdit D	)etails			
Sedex Company Reference: (only available on Sedex System)	ZC: 407476341	Sedex Site Reference: (only available on Sedex System)			ZS: 407	7491547
Business name (Company name):	EDAC Power Electro	onics	(SuZhou) CO.,I	LTD		
Site name:	EDAC Power Electron 翌胜电子(苏州)有阿		•	LTD		
Site address: (Please include full address)	No. 59, Changsheng Road, Suzhou Indus Park, Suzhou City, Jiangsu Province 江苏省苏州工业园区第 路 59号	stry	Country:		China	
Site contact and job title:	Mr. Chunfang Xu/H	IR Mai	nager			
Site phone:	+86-0512-62821628		Site e-mail:		Cf.xu	@edac.cn
SMETA Audit Pillars:	□ Labour Standards	Safe	Health & ety (plus ironment 2- ar)	☐ Environr 4-pillar	nent	☐ Business Ethics
Date of Audit:	July 25-26, 2019					
Audit Company N	lame & Logo:					

TÜV R	heinland (Shangho	ni) Ltd.						
Audit Conducted By								
Affiliate Audit Company	×	Purchaser		Retailer				
Brand owner		NGO		Trade Union				
Multi– stakeholder				Combined Audit (select all that apply)				

**TÜV**Rheinland®

Precisely Right.

Report Owner (payer):

EDAC Power Electronics (SuZhou) CO.,LTD



### **Audit Content:**

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

#### 2-Pillar SMETA Audit

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

#### 4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



## **SMETA Declaration**

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

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

Any exceptions to this must be recorded here (e.g. different sample size): Nil

Auditor Team (s) (please list all including all interviewers): Hannah Zhang
Lead auditor: Hannah Zhang
APSCA number: 21702975

Lead auditor APSCA status: Active

Team auditor: N/A APSCA number: N/A

Interviewers: Hannah Zhang APSCA number: 21702975

Report writer: Hannah Zhang Report reviewer: Ina Zeng

Date of declaration: July 26, 2019

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

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



## **Summary of Findings**

tothe	Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing		Area of Non–Conformity (Only check box when there is a non– conformity, and only in the box/es where the non–conformity can be found)			Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
	e audit report, hyperlinks are retained.	ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP						0	0	Nil
ОВ	Management systems and code implementation					0	0	0	Nil
1.	Freely chosen Employment					0	0	0	Nil
2	Freedom of Association					0	0	0	Nil
3	Safety and Hygienic Conditions					2	0	0	Summary of Non-compliances finding:  1. Partial workers did not wear protective equipment.  2. No occupational hazardous factor notification.
4	Child Labour					0	0	0	Nil
5	Living Wages and Benefits		$\boxtimes$			1	0	0	Summary of Non-compliances finding: Insufficient social insurances were provided for employees.
6	Working Hours	×	$\boxtimes$			1	0	0	Summary of Non-compliance finding:



							Monthly OT exceeded 36 hours per legal requirement.
7	<u>Discrimination</u>			0	0	0	Nil
8	Regular Employment			0	0	0	Nil
8A	Sub-Contracting and Homeworking			0	0	0	Nil
9	<u>Harsh or Inhumane Treatment</u>			0	0	0	Nil
10A	Entitlement to Work			0	0	0	Nil
10B2	Environment 2-Pillar			0	0	0	Nil
10B4	Environment 4-Pillar			N/A	N/A	N/A	N/A
10C	<u>Business Ethics</u>			N/A	N/A	N/A	N/A
C = 12 =	ral abaan kations and supersons of	ا ماند مالد					

General observations and summary of the site:

#### Audit process:

This initial audit was conducted by TUV Rheinland. One auditor assessed the factory's operations against the ETI Base Code and local legislations on a sampling basis in one day.

Overview of opening meeting:

At 8:30am, auditor entered the facility then held an opening meeting according to the ETI Base Code; the management representative was present in the meeting. They stated that they would be co-operative with this audit.

#### Positive findings:

- 1. The factory had established a social policy and procedure for delivering the compliance to ETI Code.
- 2. No forced, bonded or prison labour was identified in the factory.
- 3. 2 worker representatives were elected freely by all workers on November 1, 2018.
- 4. Sufficient clean toilets separated by gender were available at all times to workers.
- 5. There was adequate fire equipment in the factory and maintained well. The check records were available for review.

- 6. There were no child labour and young workers found during the factory tour and document review.
- 7. There was no illegal deduction from wages in the factory. The overtime wage was paid per legal requirement.
- 8. The standard working hours was 8 hours per and 5 days per week.
- 9. There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
- 10. All workers were hired by the factory directly and signed contract with the factory.
- 11. No agency labours or subcontractors were used by the factory.
- 12. The factory had a policy to prohibit the harsh or inhumane treatment.
- 13. There were procedures on environment protective.

#### Negative findings:

- 1. It was noted that the workers who contacted with the chemicals (i.e. glue) did not wear the mask provided by the factory.
- 2. It was noted that no occupational hazardous factor notification card was posted on site.
- 3. Based on social insurance receipts on June 2019, there were 364 employees in the factory, only 160 employees enrolled in medical, endowment, unemployment, maternity and work-related injury insurance. 100 employees were provided with commercial insurances.
- 4. Based on attendance records from June 1, 2018 to audit day review, it was found that around 98% workers' overtime hours exceeded 36 hours per month in past 12 months except February 2019. Three sampled months May 2019 (current paid month), January 2019 and September 2018 were randomly selected with the maximum monthly overtime of around 1% workers were up to 71 hours in May 2019.

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



## **Site Details**

Site Details								
A: Company Name:	EDAC Power Electro	nics (SuZhou)	CO.,LTD					
B: Site name:	EDAC Power Electro 翌胜电子(苏州)有限	٠,	CO.,LTD					
C: GPS location: (If av ailable)	GPS Address: No. 59, Changsheng Road, Suzhou Industry Park, Suzhou City, Jiangsu Province, China 中国江苏省苏州工业园区常胜路 59号							
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business licence number: 913205947395773770 Valid from July 4, 2002 to July 3, 2052							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Personal communication equipment fitting or parts							
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	EDAC Power Electronics (SuZhou) CO.,LTD was located at No. 59 Changsheng Road, Suzhou Industry Park, Suzhou City, Jiangsu Province, China.  The factory owned one 1-storey warehouse building, one 2-storey production and office building and two 5-storey dormitory buildings.  For detail, please refer to below table.							
	Production Building no	Description		Remark, if any				
	Floor 1	Warehouse	,	Nil				
	Is this a shared building?	No						
	Production Building no	Description		Remark, if any				
	Floor 1	Office		Nil				
	Floor 2	Plugging in, soldering, assembly, c test and pa workshop	aging	Nil				
	Is this a shared building?	No						
	bullainge							



	Production Building no	Description	Remark, if any		
	Floor 1	Canteen	Nil		
	Floor 2-5	Male dormitory	Nil		
	Is this a shared	,			
	building?	No			
	Draduction	Description	Dono orly if any		
	Production	Description	Remark, if any		
	Building no Floor 1	Idla	NI:I		
		Idle	Nil		
	Floor 2-5	Female dormitory	Nil		
	Is this a shared building?	No			
	male employees and were migrant came. The factory used electer employees worked for workers' (except care 17:00 with 1.5 hours loovertime was from 18 working hours of care was at least or voluntary. Workers wend of following more 1: Visible structural in Yes	d 222 female employ from the different proctronic system to recors 5 days a week and teen staff) working hunch-time from 11:308:00-20:00 and 8 housteen staff was 9:00-1 ne day off per week, ere paid by hourly ranth in cash.	ovinces. Ford attendant. All d 8 hours per day. All hour was from 7:30 to 0 to 13:00. If needed, rs on Saturday. The 3:00 and 15:00-19:00.  Overtime was the and were paid at		
	No     F2: Please give detail     No large crack was a     F3: Does the site hav	observed.	er evaluation?		
	□ No				
	F4: Please give detai The factory provided	l construction projec	t completion		
	acceptance check	for review.			
G: Site function:	☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor				
H: Month(s) of peak season: (if applicable)	Nil				



I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	The main products manufactured by the factory were personal communication equipment fitting or parts. The main production processes were listed as follows: Plugging in, soldering, assembly, aging test and packing. There were 6 assembly lines on site.
J: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☑ Other (specify) worker representatives ☐ None
K: Is there any night production work at the site?	
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>L1: If yes, approx. % of workers in on site accommodation</li> <li>33%(120 out of 363 employees)</li> </ul>
M: Are there any off site provided worker accommodation buildings	☐ Yes ☑ No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<ul><li> ☐ Yes</li><li>☐ No</li><li>N1: If no, please give details</li></ul>



Audit Parameters							
A: Time in and time out	A1: Day 1 Tir A2: Day 1 Tir 17:00			y 2 Time in: 8:00 y 2 Time out:	A5: Day 3 Time in: N/A A6: Day 3 Time out: N/A		
B: Number of auditor days used:	2MD (One a	uditor in 2 da	iys)				
C: Audit type:	Full Initia Periodic Full Follo Partial Fo Partial O	w-up ollow-Up Other					
D: Was the audit announced?							
E: Was the Sedex SAQ available for review?							
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☐ No If <b>Yes</b> , please capture detail in appropriate audit by clause						
G: Who signed and agreed CAPR (Name and job title)	Mr. Chunfai	ng Xu/HR Mai	nager				
H: Is further information available (If yes, please contact audit company for details)	☐ Yes ☑ No						
I: Previous audit date:	N/A						
J: Previous audit type:	N/A						
K: Were any previous audits reviewed for this audit	☐ Yes ☐ No ☐ N/A						
A valid subtraction on			1	W/ and car Dopprose			
Audit attendance		Manageme Senior manageme		Worker Represe Worker Commit representatives			

A: Present at the opening meeting?    Yes					
C: Present at the closing meeting?  D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)  E: If Union Representatives were not present please explain reasons why:  N/A. There was no Union in the factory.	A: Present at the opening meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ☐ No	N/A
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)  E: If Union Representatives were not present please explain reasons why:  N/A. There was no Union in the factory.	B: Present at the audit?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ☐ No	N/A
present please explain reasons why (only complete if no worker reps present)  E: If Union Representatives were not present please explain reasons why:  N/A. There was no Union in the factory.	C: Present at the closing meeting?	⊠ Yes □ No	⊠ Yes □ No	☐ Yes ☐ No	N/A
present please explain reasons why:	present please explain reasons why	N/A.			
	present please explain reasons why:	N/A. There was no Union in the factory.			



## **Worker Analysis**

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

Worker Analysis									
		Local			Migrant*			Total	
	Permanent	Temporary	Agency	Permanen <del>t</del>	Temporary	Agency	Home workers		
Worker numbers – Male	58	0	0	84	0	0	0	142	
Worker numbers – female	62	0	0	160	0	0	0	222	
Total	120	0	0	244	0	0	0	364	
Number of Workers interviewed – male	1	0	0	12	0	0	0	13	
Number of Workers interviewed – female	1	0	0	12	0	0	0	13	
Total – interviewed sample size	2	0	0	24	0	0	0	26	



A: Nationality of Management	Chinese	
B: Please list the nationalities of all workers, with the three most common nationalities listed first.  Please add more nationalities as applicable to site. Add more rows if required.	Nationalities: B1: Nationality 1: _China_ B2: Nationality 2: B3: Nationality 3:	Was the list completed during peak season?  Yes No If no, please describe how this may vary during peak periods: N/A. There was no obvious peak season.
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1100 C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3	
D: Worker remuneration (management information)	D:% workers on piece rate D1:100% hourly paid workers D2:% salaried workers  Payment cycle: D3:% daily paid D4:% weekly paid D5:100% monthly paid D6:% other D7: If other, please give details	



Worker Interview Summary							
A: Were workers aware of the audit?							
B: Were workers aware of the code?							
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	4 groups with 20 emplo group)	yees(5 employees in a					
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 3	D2: Female: 3					
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.  Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruit ment	☐ Yes ☐ No  If no, please give details						
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?							
G: In general, what was the attitude of the workers towards their workplace?	<ul><li>☒ Favourable</li><li>☐ Non-favourable</li><li>☐ Indifferent</li></ul>						
H: What was the most common worker complaint?	The employees stated to with the factory.	hat they were satisfied					
I: What did the workers like the most about working at this site?	The wages and work co	ondition.					
J: Any additional comment(s) regarding interviews:	Nil						
K: Attitude of workers to hours worked:	They could accept the working hours. And they stated that overtime was voluntary and they could earn more money by overtime working.						
L. Is there any worker survey information available?							
☐ Yes ☑ No L1: If yes, please give details:							



#### M: Attitude of workers:

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

26 workers were selected for interview and they were interviewed as 5 groups with 20 workers and 6 workers individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with the wages. All workers could give their suggestion through the suggestion box confidentially and they also felt able to complaint with the worker representatives. And the manager treated the workers with respects.

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

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

There were 2 worker representatives in the factory. One worker representative was interviewed. The worker representative stated that the manager was in favour of their work in the factory. Sufficient meetings were conducted with the managements for workers' benefit, health and safety and etc.

#### O: Attitude of managers:

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

The factory management was cooperative throughout the audit. The auditor could access to all facilities freely, and all requested documents and records were provided in a timely manner. The factory agreed that the auditor took photos and copied relevant documents or records in the factory. The confidential interviews were conducted with employees who were chosen freely without any influence by the factory.



## **Audit Results by Clause**

#### **OA: Universal Rights covering UNGP**

(Click here to return to summary of findings)

#### 0.A. Guidance for Observations

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

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

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 underst and, 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 covering human rights impacts and issues, and communicated to all appropriate parties, including its own suppliers.
- 2. Ms. Jiadong Wang/Manager was nominated to implement standards concerning Human rights.
- 3. A procedure document was in place to identify their stakeholders in the site.
- 4. The factory had a procedure to address effective remediation when adverse identified.
- 5. The factory conducted the internal social accountability audit annually.
- 6. The factory had a transparent system in place for confidentially reporting human rights impacts without fear of reprisal.

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

Details:

Social accountability policy

Internal social accountability audit and management review records

Communicate records of Social accountability policy to suppliers

Worker and management interview

Any other comments:



	Γ_	
A: Policy statement that expresses commitment to respect human rights?	<ul><li></li></ul>	policy to respect human
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<ul><li>X Yes</li><li>No</li><li>Please give details:</li><li>Name: Mr. Jiadong Wang</li><li>Job title: Manager</li></ul>	
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☐ Yes ☐ No C1: Please give details: The workers could use sugge confidentially reporting and communicate with work reporting of retaliation processing to the control of	d they could also presentatives directly. procedure was in place
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rightscompatible, a source of continuous learning and based on stakeholder engagement)	<ul><li> ☑ Yes</li><li> ☐ No</li><li> D1: If no, please give detail</li></ul>	s
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☐ Yes ☐ No E1: Please give details:  All employee information a kept in the office and no er	
	the information without per	
Fin	dings	
Finding: Observation  Description of observation: None Local law or ETI/Additional elements / customer spendal comments: N/A Comments: N/A		Objective evidence observed: N/A
Good exam	ples observed:	
Description of Good Example (GE): None	*	Objective Evidence Observed: N/A



# **Measuring Workplace Impact**

Workplace Impact		
A: Annual worker tumover:  Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: 19.2%	A2: This year 12.2%
B: Current % quarterly (90 days) turnover: Number of w orkers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	5.5%	
C: 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 w orkdays in the year	C1: Last year: 0 %	C2: This year 0 %
D: 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	Q 1: 0% Q 2: 0% Q 3: 0% Q 4: 0%	
E: Are accidents recorded?	☐ Yes ☐ No E1: Please describe: Based on the records review, the months.	ere was no accident in past 12
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total worke rs]	F1: Last year: Number: 0	F2: This year: Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers:  [(Number of work related accidents and injuries * 100) / Number of total workers]	Q 1: 0% Q 2: 0% Q 3: 0% Q 4: 0%	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0% workers	I2: 12 months 0% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 0% workers	J2: 12 months 0% workers



#### **OB: Management system and Code Implementation**

(Click here to return to summary of findings)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.4 Suppliers are expected to communicate this Code to all employees.

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

#### Current Systems and Evidence Examined

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

#### **Current systems:**

- Based on management interview, they knew local laws and ETI Based Code basically and updated the law when it applicant.
- 2. The factory provided the ETI training for all employees.
- 3. Mr. Chongiiang Wu/Admin Manager was appointed to be responsible for the Code.
- 4. The factory had communicated this Code to their suppliers. The suppliers signed the commitment to respect the Code.
- 5. The management review was conducted on December 13, 2018.
- 6. The social compliance policies were established and update annually, the latest vision was updated on November 1, 2018.

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

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Training records

Worker and management interview

Commitment letters of social accountability policy of suppliers

Social compliance policy and management procedure

Any other comments:

Management	Systems:
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☐ No A1: Please give details: Searched in the internet, no fines or prosecutions were found during the audit.



B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>B1: Please give details:</li> <li>The factory established the policies on forced labour, child Labour, discrimination, harassment and abuse.</li> </ul>
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The factory provided trainings to all employees and no such issues were identified during the audit.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<ul> <li>✓ Yes</li> <li>☐ No</li> <li>D1: Please give details:</li> <li>The factory provided the annual trainings for managers and workers.</li> </ul>
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<ul> <li>✓ Yes</li> <li>☐ No</li> <li>E1: Please give details:</li> <li>The factory provided the training records for review and it was confirmed by interview.</li> </ul>
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits).  Please detail (Number and date).	☐ Yes ☐ No F1: Please give details: The factory obtained the system certifications ISO9001:2015 and valid from September 13, 2018 to September 12, 2021. The certificate registration number was TUV100020686.
G: Is there a Human Resources manager/department? If Yes, please detail.	<ul> <li> ☒ Yes</li> <li> ☐ No</li> <li>G1: Please give details:</li> <li>Mr. Chunfang Xu/HR Manager was in charge of HR department.</li> </ul>
H: Is there a senior person / manager responsible for implementation of the code	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>H1: Please give details:</li> <li>Mr. Chongjiang Wu/Admin Manager was responsible for implementation of the code.</li> </ul>
I: Is there a policy to ensure all worker information is confidential?	☐ Yes ☐ No ☐ I1: Please give details: A policy was in place to ensure all workers information is kept confidentially.
J: Is there an effective procedure to ensure confidential information is kept confidential?	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>J1: Please give details:</li> <li>The factory had the effective confidential policy.</li> </ul>



K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☐ Yes ☐ No K1: Please give details: There were risk assessments to evaluate policy and procedure effectiveness. The factory conducted internal audit annually to assess the implementation of the policies.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<ul> <li> ☐ Yes ☐ No L1Please give details: The factory had a process to control the risk when issues found. </li> </ul>
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<ul> <li>         ∑ Yes         □ No         M1: Please give details:         The factory communicated the labour standards to its own suppliers and required them to respect the standards.     </li> </ul>
Land rig	hts
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<ul> <li>         ∑ Yes         □ No         N1: Please give details:         The factory provided all required land rights licenses for review, such as property ownership certificate.     </li> </ul>
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>O1: Please give details:</li> <li>The site had systems in place to conduct legal due diligence and collected related laws.</li> </ul>
P: Does the site have a written policy and procedures specific to land rights.  If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☐ Yes☐ NoP1: If yes, how does the company obtain FPIC: N/A
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<ul> <li>☐ Yes</li> <li>☐ No</li> <li>Q1: Please give details:</li> <li>The facility site compensated the government for the land prior to the facility being built and expanded.</li> </ul>
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes☐ No R1: Please give details: N/A. No a specific land acquisition.



S: Is There any evidence of illegal appropriation of for facility building or expansion of footprint.		appropriation of land for
Non-	compliance:	
☐ NC against customer code:  None	IC against Local Law	Objective evidence observed: N/A
Local law and/or ETI requirement: N/A		
Recommended corrective action: N/A		
Or	oservation:	
Description of observation: None	Jaci valion.	Objective evidence
Local law or ETI requirement: N/A		observed: N/A
Comments: N/A		
Good Exa	mples observed:	
Description of Good Example (GE): None		Objective evidence observed: N/A



#### 1: Freely Chosen Employment

(Click here to return to summary of findings)

#### ETI

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

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

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to underst and, 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 a policy on forced, bonded or involuntary prison labour.
- 2. Based on workers interview, all workers were not require to lodge "deposits" and they could keep their identify card by themselves.
- 3. All workers were free to leave after work shift. Overtime was voluntary.
- 4. No forced, bonded or involuntary prison labour was identified during the audit.
- 5. All workers could leave their employers after notice period.

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

Det	

Forced, bonded or involuntary prison labour policy

Recruitment policy

Employee labour contract

Employee interview

Any other comments:

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☐ No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ☑ No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	☐ Yes ☐ No C1: If yes, please give details and category of worker affected:



	After 2 days! notice in adverse as for the arms.	action workers as 20
	After 3 days' notice in advance for the prol days' notice in advance for the formal work terminate their employment	
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes☐ No☐ No☐ Not applicable E1: Please describe finding:	
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No F1: Please describe finding: All employees could leave the site freely at	end of the work day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<ul> <li>Yes</li> <li>No</li> <li>Not applicable</li> <li>G1: If yes, please give details and category</li> <li>The factory identified the risks in its suppliers</li> <li>assessments in its supply chain.</li> </ul>	
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<ul> <li>☐ Yes</li> <li>☐ No</li> <li>H1: Please describe finding:</li> <li>The factory had a policy to prohibit forced labour and internal audit was conducted to assess the implementation of the policy.</li> </ul>	
Non-compliance:		
1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code: None  Local law and/or ETI requirement N/A  Recommended corrective action: N/A		
Observation:		
Description of observation: None  Local law or ETI requirement: N/A		Objective evidence observed: N/A
Comments: N/A		



	Good Examples observed:	
Description of Good Example (GE): None		Objective evidence observed: N/A



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

(Click here to return to summary of findings) (Click here to return to Key Information)

#### ETI

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

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to underst and, 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. There was no Union in the factory. All workers had the rights to join or form a Union.
- 2. There were 2 worker representatives elected freely by all workers. Sufficient meetings among worker representatives and managements were conducted regularly to address workers' complaints.
- 3. All employees could raise their right with the work representatives.
- 4. All employees had the rights of freedom of association and collective bargaining.
- 5. The worker representatives were not discriminated and had access to carry out their representative functions in the workplace.

renewal/expiry date where appropriate):
Details: Workers representative selection procedure and selection record Worker representative and workers interview Freedom of association and collective bargaining procedure
Any other comments: Nil

A: What form of worker representation/union is there on site?	<ul> <li>□ Union (name)</li> <li>□ Worker Committee</li> <li>☒ Other (specify) worker representatives</li> <li>□ None</li> </ul>
B: Is it a legal requirement to have a union?	☐ Yes ☐ No
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☐ No



D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<ul> <li>✓ Yes</li> <li>☐ No</li> <li>D1: Please give details:</li> <li>Worker representatives</li> <li>D2: Is there evidence of</li> <li>☒ Yes</li> <li>☐ No</li> </ul>	free electi	ions?
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>E1: Please give details:</li> <li>The factory provided the meeting room for worker representatives to carry out their functions.</li> </ul>		
F: Name of union and union representative, if applicable:	N/A. There was no Union in the factory.		re evidence of free elections? No N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker representatives		ere evidence of free elections? No N/A
H: Are all workers aware of who their representatives are?	⊠ Yes □ No		
I: Were worker representatives freely elected?	⊠ Yes □ No	11: Date 2018	of last election: November 1,
J: Do workers know what topics can be raised with their representatives?	⊠ Yes □ No		
K: Were worker representatives/union representatives interviewed?	☐ Yes ☐ No If <b>Yes</b> , please state how many: 1 work representative was interviewed.		
L: Please describe any evidence that union/worker's committee is effective?  Specify date of last meeting; topics covered; how minutes were communicated etc.	Sufficient meeting was conducted regularly. The latest meeting was conducted on July 8, 2019 with the topic of social compliance policy and the grievance mechanism.		
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No		
If <b>Yes,</b> what percentage by trade Union/worker representation	M1:% workers cover Union CBA N/A	red by	M2:% workers covered by worker rep CBA N/A
M3: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No N/A		



Non-compliance:		
1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code:  None	Objective evidence observed: N/A	
Local law and/or ETI requirement N/A		
Recommended corrective action: N/A		
Observation:		
Description of observation: None	Objective evidence	
Local law or ETI requirement: N/A	observed: N/A	
Comments: N/A		
Good Examples observed:		
Description of Good Example (GE): None	Objective evidence observed: N/A	



#### 3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings) (Click here to return to Key Information)

#### FTI

- 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The factory established a health and safety policy. Mr. Jiadong Wang/Manager was appointed to be responsible for the health and safety issues.
- 2. The factory provided the training of health and safety policy for all employees.
- 3. The occupation hazardous factor test was conducted in the factory. The occupation disease examinations were provided to the workers.
- 4. The training on the usage of PPE was provided for all workers and the appropriate PPE was provided for all workers.
- 5. All chemicals were stored in anti-leakage containers with MSDS.
- 6. There was a first aid kit at each workshop with adequate medicines. Two first aiders with first aider certificates were available in the factory.
- 7. Based on observation on site, firefighting equipment was adequate in the workshop, dormitory and canteen. The factory inspected the firefighting equipment monthly and they were all in good condition.
- 8. There were the electricians in the factory. The electrician certificates were provided for review. The circuit facilities were maintained well in the factory and checked regularly.
- 9. There were 2 elevators used in the factory. The special equipment operator certificate was provided for review.
- 10. Sufficient clean toilets with privacy door were available at all times to workers.
- 11. All worker could access to potable water freely.
- 12. Fire drills were conducted and recorded every 6 months in the factory covering all areas including the dormitory and canteen. The latest one conducted on April 26, 2019.
- 13. The factory provided the accident records for review. There was no accident happening in past 12 months in the factory.
- 14. The canteen and accommodation were provided for all employees for free. The food business licence and health certificates of the canteen staff were provided for review.

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

Details:



Construction project completion acceptance check and fire control acceptance check Health and safety policy Health and Safety training records Work-related Accident and Injury records Work interview Drinking water test report on November 6, 2018 Fire drill on April 26, 2019 Occupation hazardous factor test on November 9, 2018 Food business licence expired on September 7, 2021 First aider certificates expired on May 25, 2021
Any other comments: Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<ul> <li>         ∑ Yes         ☐ No         A1: Please give details:         The facility had established Health &amp; Safety and occupational Health &amp; Safety policies. The training was provided to all employees.     </li> </ul>
B: Are the policies included in workers' manuals?	<ul> <li>         ∑ Yes</li> <li>         No</li> <li>         B1: Please give details:</li> <li>         Based on document review, the policies were included in worker's manual.     </li> </ul>
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☐ No C1: Please give details: There were no structural additions in the factory.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☐ Yes ☐ No D1: Please give details:  The auditor was informed on H&S and provided with personal protective equipment such as masks during factory tour.
E: Is a medical room or medical facility provided for workers?  If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	<ul> <li> ☐ Yes ☐ No E1: Please give details: The first aid kit was available in each workshop. </li> </ul>
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<ul> <li>☐ Yes</li> <li>☐ No</li> <li>F1: Please give details:</li> <li>There were two first aiders with first aider certificates in the factory.</li> </ul>



G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes☐ No☐ S1: Please give details: N/A. The factory did not provide trans	sport for workers.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<ul> <li>☒ Yes</li> <li>☐ No</li> <li>H1: Please give details:</li> <li>There was secure personal storage spand it was fit for purpose.</li> </ul>	ace in the living room
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☐ Yes ☐ No ☐ I1: Please give details: ☐ H&S Risk assessments were conducted risk. And the factory provided the train	
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☐ Yes ☐ No ☐ J1: Please give details:  The factory provided EIA report and cenvironment monitoring reports were	
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☐ Yes ☐ No K1: Please give details: The factory established procedures to requirements on environmental stand	
	Non–compliance:	
Description of non-compliance:     NC against ETI		Objective evidence observed 1: Factory tour Please refer to NC photo No.1
Local law and/or ETI requirement Law on the People's Republic of China on Production Safety Article 42, An employer shall provide employees with personal protective equipment per legal requirement and industrial standard and monitor and educate employees on how to wear and use such personal protective equipment according to use instruction.  ETI requirement 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.		
Recommended corrective action:		



It is recommended that the factory should retrain the workers and monitor them to wear protective equipment.  2. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code:  It was noted that no occupational hazardous factor notification card was	Objective evidence observed 2: Factory tour and management interview
Local law and/or ETI requirement: Law on the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24 The occupational disease inductive employer should set up an eye catching bulletin board to announce the occupational disease inductive rules and regulations, operating rules, occupational disease inductive accidents emergency rescue measures and occupational disease inductive factors test results in the workplace.  Warning labels and waming instructions in Chinese should be prominently displayed on the occupational disease inductive posts. The warning note should specify the type of occupational disease inductive hazards, consequences, prevention and emergency treatment measures.  ETI requirement 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.  Recommended corrective action:  It is recommended that the factory should post the occupational hazardous	
factor notification card on site.	
Observation:	
Description of observation: None  Local law or ETI requirement: N/A	Objective evidence observed:
Recommended corrective action: N/A	

Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: N/A



#### 4: Child Labour Shall Not Be Used

(Click here to return to summary of findings) (Click here to return to Key Information)

#### FTI

- 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 underst and, 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The factory established a recruitment policy to prohibit children labour under 16 years old and checked the ID card information before employment.
- 2. The factory established the children labour remediation policy in place.
- 3. Based on the document review, the youngest worker in the facility was 18 years old born on July 15, 2001 and employed on July 18, 2019.
- No child labour policy and special protection of young workers procedures were established in the factory.
- 5. No child labour or young worker were verified during the audit.

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

Details:

Recruitment policy Children labour remediation policy Personnel file and contract Worker interview

Any other comments:

A: Legal age of employment:	16 years old
B: Age of youngest worker found:	18 years old
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
D: % of under 18's at this site (of total workers)	0 %



E: Are workers under 18 subject to hazardous work assignments?  (Go to clause 3 – Health and Safety)  E: Are workers under 18 subject to   Yes   No   E1: If yes, give details   N/A, there was no worker under 18 years old in the factory.	
Non–compliance:	
Objective evidence observed: N/A	
Observation:	
Objective evidence	
<b>observed:</b> N/A	
Good Examples observed:	
Objective evidence observed: N/A	



## 5: Living Wages are Paid

(Click here to return to summary of findings) (Click here to return to Key information)

#### FTI

- 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 underst and, 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The factory established policy and procedure on wages and benefits.
- 2. All workers were provided with written and understandable information about their employment conditions and wages before their employment.
- 3. Based on payrolls from June 2018 to May 2019 and attendance records from June 1, 2018 to audit day, all workers' wages were calculated by hourly rate with no less than RMB14.37 per hour. The minimum wage standard was RMB 2020 per month equivalent to RMB 11.61 per hour since August 1, 2018 and RMB 1890 per month equivalent to RMB10.86 per hour since July 1, 2017.
- 4. All workers' overtime wages were paid 150% of normal wage rate for overtime on weekdays and 200% of normal wage rate for overtime on weekend. No overtime on statutory holidays.
- 5. The wages were paid at end of following month in cash and the factory provided the pay slips for workers to confirm.
- 6. Benefits such as paid annual leave and statutory holidays were provided to all workers per legal requirement.
- 7. There was no illegal deduction from wages. The incoming tax fee was deducted from the wages which was allowed by laws. The social insurance fees were paid by the factory.

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

Policy and procedure on wages and benefits Payrolls records from June 2018 to May 2019 Attendance records from June 1, 2018 to audit day Social insurance records Worker interview

Any other comments:



Non-compliance:				
1. Description of non-compliance:  NC against ETI NC against Local Law NC against customer code: Based on social insurance receipts on June 2019, there were 364 employees in the factory, only 160 employees enrolled in medical, endowment, unemployment, maternity and work-related injury insurance. 100 employees were provided with commercial insurances.	Objective evidence observed: Document review, workers interview and management interview			
Local law and/or ETI requirement: Labour Law of the People's Republic of China (1994), Article 72, the sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and labourers must participate in social insurance and pay social insurance premiums in accordance with the law.  Article 73, Labourers shall, in accordance with the law, enjoy social insurance				

national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to

1. Retirement; 2. Illness or injury;

5. Child-bearing. ETI requirement 5.1

4. Unemployment; and

provide some discretionary income.

benefits under the following circumstances:

### Recommended corrective action:

It is recommended that the factory should provide five types of social insurance for all employees.

Wages and benefits paid for a standard working week meet, at a minimum,

3. Disability caused by work-related injury or occupational disease;

Observation:	
Description of observation: None Local law or ETI requirement: N/A	Objective evidence observed:
Comments: N/A	
Good Examples observed:	
Description of Good Example (GE): None	Objective Evidence Observed: N/A



Summary Information

Summary Information  Criteria	Local Law (Please state legal	Actual at the Site	Is this part of a Collective
	requirement)	(Record site results against the law)	Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 8 hours per day, 40 hours per week	A1: 8 hours per day, 40 hours per week	A2:  Yes  No N/A
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 3 hours per day and 36 hours per month	B1: Maximum 2 hours OT on normal days, 17.5 hours per week, 71 hours OT per month.	B2: Yes No N/A
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: RMB 2020 per month equivalent to RMB 11.61 per hour since August 1, 2018 and RMB 1890 per month equivalent to RMB10.86 per hour since July 1, 2017	C1: no less than RMB14.37 per hour in past 12 months	C2:  Yes  No N/A
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime	D1: 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime	D2:  Yes  No N/A



Wages analysis:  (Click here to return to Key Information)				
A: Were accurate records shown at the first request?	Yes     No     No			
A1: If <b>No</b> , why not?	N/A			
B: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 sampled employees in May 2019 (current paid month) 26 sampled employees in January 2019 (random month) 26 sampled employees in September 2018 (random month)		26 sampled employees in January 2019 (random month)	
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	☐ Yes ☒ No		C1: If <b>Yes</b> , ple	ease give details:
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ N/A		D1: If <b>No</b> , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☐ Meet ☐ Above		E1: Lowest actual wages found: Note: full time employees and please state hour / week / month etc. At least RMB14.37 per hour RMB574.8 per week RMB2299.2 per month	
F: Please indicate the breakdown of workforce per earnings:	F1:% of workforce earning under minimum wage F2:% of workforce earning minimum wage F3: <u>100</u> % of workforce earning above minimum wage			
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc. There was no bonus.			
H: What deductions are required by law e.g. social insurance? Please state all types:	Incoming tax and social insurance fee.			
I: Have these deductions been made?	☐ Yes ☒ No	dedu	ease list all ctions that been made.	1. Incoming tax 2. N/A  Please describe: It was allowed by the laws.
			ease list all ctions that	Social insurance(medical, endowment, unemployment,



		have not b made.	peen	maternity and work-related injury insurance) 2. N/A Please describe: It was paid by the factory.
J: Were appropriate records available to verify hours of work and wages?	☐ Yes ☐ No			
K: Were any inconsistencies found? (if yes describe nature)	☐ Isolate		☐ Poorr	record keeping ed incident ated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>L1: Please give details:</li> <li>No workers were asked to attend meetings before or after work without payment.</li> </ul>			
M: Is there a defined living wage: This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☐ No M1: Please specify amount/time: N/A			
M2: If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: N/A			
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<ul> <li>         ∑ Yes         ☐ No         N1: Please give details:         The factory would adjust the wage according to local minimum wage and the basic needs of workers plus discretionary income.     </li> </ul>			
O: Are workers paid in a timely manner in line with local law?				
P: Is there evidence that equal rates are being paid for equal work:	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>P1: Please give details:</li> <li>Based on payroll review, the same post were paid at the same wage.</li> </ul>			

Q: How are workers paid:	<ul><li>☐ Cash</li><li>☐ Cheque</li><li>☐ Bank Transfer</li><li>☐ Other</li><li>Q1: If other, please explain:</li></ul>



#### 6: Working Hours are not Excessive

(Click here to return to summary of findings) (Click here to return to Key Information)

#### ETI

- 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met:
  - this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days offin 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 underst and, 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 document ary or verbal evidence shown to support the systems.

### **Current systems:**

- 1. The attendant records from June 1, 2018 to audit day were provided for review. All workers worked for 8 hours per day and 5 days per week for standard working hours.
- 2. All workers except canteen staff worked from 8:00 to 17:00 with 1.5 hours lunchtime from 11:30 to 13:00. If needed, OT was from 18:00 to 20:00 and 8 hours OT on Saturday. The working hours of canteen staff was 9:00-13:00, 15:00-19:00. If needed, 4-8 hours OT on Saturday.
- 3. There was at least one day rest per week.
- 4. The maximum OT was 2 hours per day, 17.5 hours per week and 71 hours per month in May 2019.
- 5. Confirmed by worker interview, overtime was voluntary. The overtime wages were paid per legal requirement.
- 6. Electronic system was installed to record the attendance.

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

Details:



Workers and managements interview Labour Contract Attendance records from June 1, 2018 to audit day	
Any other comments: Nil	

### Non-compliance:

### 1. Description of non-compliance:

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

Based on attendance records from 1 June 2018 to audit day review, it was found that around 98% workers' overtime hours exceeded 36 hours per month in past 12 months except February 2019. Three sampled months May 2019 (current paid month), January 2019 and September 2018 were randomly selected with the maximum monthly overtime of around 1% workers were up to 71 hours in May 2019.

### Local law and/or ETI requirement:

Law on Labour Law of the People's Republic of China (1994), 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 augranteed. However, the total extension in a month shall not exceed thirty six hours.

### ETI requirement 6.1

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

#### Recommended corrective action:

The factory should ensure the overtime working hours under 36 hours per month.

Objective evider	ıce
observed:	

Managements and workers interview. Document review

Observation:			
Description of observation: None	Objective evidence observed:		
Local law or ETI requirement: N/A	N/A		
Comments: N/A			

Good Examples observed:	
None	Objective Evidence Observed: N/A



Working hours' analysis  Please include time e.g. hour/week/month  (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Electronic system(IC card)				
B: Is sample size same as in wages section?	∑ Yes     ☐ No     B1: If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	workers c		ails including % and dard hours defined greements.	
D: Are there any other types of contracts/employment agreements used?  ☐ Yes ☐ No		D1: If YES, please complete as appropriate:			
		□ 0 hrs	☐ Part time	☐ Variable hrs	☐ Other
		If "Other"	', Please define:		
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☑ No	and frequ		urs, %, types of work	xers affected
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable:  ☑ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:	F3: Is this allowed by local law?  ☐ Yes ☐ No			
	Maximum number of days worked without a day off (in sample):			:	
	6 days				



Standard/Contracted Hours worked			
G: Were standard working hours over 48	☐ Yes ☒ No	G1: If yes, % of workers & frequency:	
hours per week found?			
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☐ Yes ☑ No	H1: If yes, please give details:	
Overtime Hours worked			
I: Actual overtime hours worked in sample (State per day/week/month)	paid month); 2 hours per day, 2018(random m	17.5 hours per week, 71 hours per month in May 2019 (Current 16 hours per week, 69.5 hours per month in March onth); 15 hours per week, 65 hours per month in September	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☑ No		
K: Approximate percentage of total workers on highest overtime hours:	1%		
L: Is overtime voluntary?	☐ Yes ☐ No ☐ Conflicting Information	L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: It was confirmed by the worker interview.	
Overtime Premiums			
M: Are the correct legal overtime premiums paid?	☐ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium	M1: Please give details of normal day overtime premium as a % of standard wages: 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime. No overtime was arranged on statutory holiday.	
N: Is overtime paid at a premium?	⊠ Yes □ No	N1: If yes, please describe % of workers & frequency: 100% of workers and every month	



O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	□ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other N/A
where relevant.	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other
	N/A
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	<ul> <li>☐ Overtime is voluntary</li> <li>☐ Onsite Collective bargaining allows 60+ hours/week</li> <li>☐ Safeguards are in place to protect worker's health and safety</li> <li>☐ Site can demonstrate exceptional circumstances</li> <li>☐ Other reasons (please specify)</li> <li>N/A</li> </ul>
where relevant.	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:
	N/A. The max weekly working hours were 57.5 hours
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<ul><li> ☐ Yes</li><li>☐ No</li><li>Q1: If yes, please give details:</li><li>Labour shortages</li></ul>
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☑ No



#### 7: No Discrimination is Practiced

(Click here to return to summary of findings)

#### ETI

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

### Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to underst and, 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The factory had established a policy to prohibit discrimination.
- 2. There was no discrimination found during the audit.
- 3. All workers were distributed in all types of work without gender discrimination.
- 4. There was no evidence of sexual harassment.
- 5. No workers were required to do HIV or pregnant test before employment.

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

Details:

Policy on prohibiting discrimination Workers interview **Employment** contracts

Any other comments:

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: _53_% A2: Female_47_%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	20 skilled roles
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?:	☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion ☐ Termination or retirement ☐ No evidence of discrimination found  C1: Please give details: N/A



Professional Development		
A: What type of training and development are available for workers?	Health and safety training, usage of training and etc.	PPE training, promotion
B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?		
esjeenve, nansparem emena.	If no, please give details:	
	Non-compliance:	
1. Description of non-compliance:  NC against ETI NC against La code:  None	cal Law: 🗌 NC against customer	Objective evidence observed: N/A
Local law and/or ETI requirement N/A		
Recommended corrective action: N/A		
	Observation:	
Description of observation: None		Objective evidence observed:
Local law or ETI requirement: N/A		N/A
Comments: N/A		
G	ood Examples observed:	
Description of Good Example (GE): None		Objective evidence observed:



#### 8: Regular Employment Is Provided

(Click here to return to summary of findings) (Click here to return to Key Information)

#### FTI

- 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, subcontracting, 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 leaislation.
- 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 gareed 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 underst and, 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 document ary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The factory had a recruitment procedure in place. Mr. Chunfang Xu was in charge of recruitment issues
- 2. No sub-contractor or home-working was used in the factory.
- 3. All workers were hired by the factory directly. No agency workers was used in the factory.
- 4. All workers were not required to pay recruitment fee at any stage of the recruitment process.
- 5. The factory had signed the contract with all workers and all workers obtained a copy of the contract.

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

Details:

Labour contracts Recruitment policy

Any other comments:



Non–compliance:		
1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code:  None		Objective evidence observed: N/A
Local law and/or ETI requirement N/A		
Recommended corrective action: N/A	:	
	Observation:	
Description of observation: None		Objective evidence
Local law or ETI requirement: N/A		observed: N/A
Comments: N/A		
	Good Examples observed:	
Description of Good Example (GE): None  Objective evidence observed: N/A		
Responsible Recruitment		
All Workers		
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?  A: Were all workers presented		

☐ Yes

☑ No

affected:

B: Did workers' pay any fees,

recruitment/placement?

purpose of

taxes, deposits or bonds for the

B1: If yes, please describe details and specific category(ies) of workers

	Any transport costs between Any relocation costs aft New hire training / orien Medical exam fees Deposit bonds or other any other non-monetar Other— : If other, please give de A	d or processing fees  lodging costs after employment offer ween work place and home er commencement of employment station fees deposits y assets
D: If any checked, give details: N/	A	
country of which they are not a national		peen engaged in a remunerated activity in a as purposely migrated on a temporary basis to n a remunerated activity
A: Type of work undertaken by migrant workers:	Production and Super	rvisors
B: Please give details about recruitment agencies for migrant workers:		n country recruitment agencies) used: 0 outside of local country) recruitment
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?		C2: Observations:
D: Are Any migrant workers in skilled, technical, or management roles  Migrant Workers (this should include all migrant workers including permanent	<ul><li>✓ Yes</li><li>☐ No</li><li>D1: If yes, number and 25 skilled roles and 50</li></ul>	

workers, temporary and/or seasonal

workers)



## **NON-EMPLOYEE WORKERS**

D: Is there a legal contract / agreement with all agencies?

Recruitment Fees:		
A: Are there any fees?	☐ Yes ☐ No N/A	
B: If yes, check all that apply:	Serv App Rec Plac Skills Skills Skills Skills Any	ruitment / hiring fees ice fees blication costs commendation fees cement fees ninistrative, overhead or processing fees stests iffications dical screenings sports/ID's k / resident permits n certificates ce clearance fees transportation and lodging costs after employment offer transport costs between work place and home relocation costs after commencement of employment w hire training / orientation fees dical exam fees posit bonds or other deposits other non-monetary assets er other, please give details:
C: If any checked, give details:	N/A	
•	_	Agency Workers (if applicable) who are not directly paid by the site, but paid by the agency, Usually the and the wages of the individual workers are paid by the agency.)
A: Number of agencies used (average):		A1: Names if available: N/A
B: Were agency workers' age / pay / hours included within the scope of this audit?		☐ Yes ☐ No N/A
C: Were sufficient documents for agency workers available for review?		☐ Yes ☐ No N/A

☐ Yes

☐ No

N/A

D1: Please give details:

SM	
	A

E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes☐ No☐ No E1: Please give details: N/A
	Contractors: erally individuals who supply several workers to a site. Usually the contractors e workers are paid by the contractor. Common terms include, gang bosses, labor provider,
A: Any contractors on site?	☐ Yes ☐ No A1: If yes, how many contractors are present, please give details:
B: If <b>Yes</b> , how many workers supplied by contractors?	N/A
C: Do all contractor workers understand their terms of employment?	☐ Yes☐ No C1: Please describe finding: N/A
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law	w: N/A



### 8A: Sub-Contracting and Homeworking

(Click here to return to summary of findings) (Click here to return to Key Information)

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

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

Note to auditor on homeworking:

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

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to underst and, 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 document ary or verbal evidence shown to support the systems.

### **Current systems:**

- 1. During the factory tour, all processed were finished in the factory. No subcontractor was found during the audit.
- Based on production records, there was no homeworking in the factory.
- 3. The factory established procedures to manage it suppliers.

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

Details:

Management interview and worker interview

Factory tour.

**Production records** 

Non–compliance:		
□ NC against ETI □ NC against Local Law: □ NC against customer	Objective evidence observed: N/A	
Recommended corrective action: N/A		
Observation:		



Description of observation: None  Local law or ETI requirement: N/A  Comments: N/A				Objective evidence observed: N/A
	Good Examples ob	served:		
Description of Good Example (GE) None	:		c	Objective evidence observed: N/A
Sum	nmary of sub-contracting  Not Applicable p		ıble	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	☐ Yes ☐ No A1: Please describe:			
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If <b>Yes</b> , summarise d	letails:		
C: Number of sub- contractors/agents used:				
D: Is there a site policy on sub- contracting?	☐ Yes ☐ No D1: If <b>Yes</b> , summarise o	details:		
E: What checks are in place to ensure no child labour is being used and work is safe?				
Summary of homeworking − if applicable  ☑ No† Applicable please x				
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If <b>Yes</b> , summarise o	details:		
B: Number of homeworkers	B1: Male:	B2: Female	<del>)</del> :	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly☐ Through Agents		C1: If thro agents:	ugh agents, number of



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



## 9: No Harsh or Inhumane Treatment is Allowed (Click here to return to summary of findings)

### ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<ul> <li> ☐ Yes</li> <li>☐ No</li> <li>A1: Please give details:</li> <li>The hotline was posted on site. All workers could use hotline to the 3rd party.</li> </ul>
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Based on workers interview, all workers were aware of these channels.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Hotline and suggestion box
D: Which of the following groups is there a grievance mechanism in place for?	₩ Workers     ☐ Communities     ☐ Suppliers     ☐ Other  D1: Please give details: The workers could access to workers' representative and general manager directly. They could also write anonymous letter to the suggestion box.
E: Are there any open disputes?	☐ Yes ☐ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<ul><li></li></ul>
G: Is there a published and transparent disciplinary procedure?	☑ Yes □ No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	☑ Yes □ No H1: If no, please give details

I: Does the disciplinary procedure allow	Yes	
for deductions from wages (fines) for	⊠ No	
disciplinary purposes (see wages		
section)?	11: If yes, please give details	
To complete 'current systems' Auditors examine punderst and, and record what controls and process procedures are carried out, who is /are responsible f	es are currently in place e.g. record what policie	es are in place, what relevant
<ul> <li>Current systems:</li> <li>1. A policy was established to prohibit phorother harassment and verbal abuse of the policy.</li> <li>2. There were several channels and common the policy.</li> </ul>	or other forms of intimidation. And all	employees were aware
inhuman treatment issues.  3. Based on workers interview, no mental / physical coercion was identified during the audit.		
Evidence examined – to support system de renewal/expiry date where appropriate):	escription (Documents examined & rel	evant comments. Include
Details: No harsh and inhumane treatment policy Workers interview		
Any other comments: Nil		
	Non-compliance:	
	Non-compliance.	
Description of non-compliance:     NC against ETI	al Law: 🗌 NC against customer	Objective evidence observed: N/A
<b>Local law and/or ETI requirement</b> N/A		
<b>Recommended corrective action:</b> N/A		
Observation:		
Description of observation: None		Objective evidence observed:
Local law or ETI requirement: N/A		N/A
Comments: N/A		



Good Examples observed:	
Description of Good Example (GE): None	Objective evidence observed: N/A



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

(Click here to return to NC-table)

#### **Additional Elements**

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

### **Current Systems and Evidence Examined**

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

### **Current systems:**

- 1. There was policy to ensure only employees with a legal right shall be employed or used.
- 2. The factory checked all employees original ID card before employment and kept ID card copy for
- 3. No immigration worker used in the factory.
- 4. The factory communicated the policy that only employees with a legal right shall be employed to its suppliers.

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

Details:

Recruitment policy

Workers and managements interview

Personnel file

Any other comments:

Non-compliance:		
1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code: None	Objective evidence observed: N/A	
Local law and/or ETI requirement N/A		
Recommended corrective action: N/A		

Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement: N/A	N/A
Comments: N/A	

Good Examples observed:		
Description of Good Example (GE): None		Objective evidence observed: N/A



#### 10. Other issue greas 10B2: Environment 2-Pillar

(Click here to return to summary of findings)

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

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

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

### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to underst and, 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 provided the EIA report and approval for review.
- 2. The factory collected the related law on environment and updated regularly.
- 3. Mr. Chunfang Xu/HR Manager was appointed to responsible for the environment improvement.
- 4. The managements were aware of their end client's environmental standards and code requirements. A procedure was in place to compliance with the Code.
- The factory obtained the ISO14001 certificate.

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

Details:

Environment protection policy

EIA and approval

Environment impact monitoring report

ISO14001:2015 certificate valid from September 4, 2018 to September 1, 2021

Any other comments:

Non–compliance:		
1. Description of non-compliance:  NC against ETI NC against Local Law: NC against customer code: None	Objective evidence observed: N/A	
Local law and/or ETI requirement N/A		
Recommended corrective action: N/A		



Observation:	
Description of observation: None	Objective evidence observed:
Local law or ETI requirement: N/A	N/A
Comments: N/A	

Good Examples observed:		
Description of Good Example (GE): None		Objective evidence observed: N/A

Other findings

## Other Findings Outside the Scope of the Code

None observed.

### **Community Benefits**

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None observed.



# **Appendix 1**

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



## **Photo Form**







Factory nameplate

Factory entrance

Production building







Dormitory building

Plugging in workshop

Soldering by hand







Soldering by machine

**Assembly line** 

Aging test









Packing line

Warehouse

Canteen



Exit, emergency light, fire alarm



Fire extinguishers and hydrant



Evacuation direction light



Attendance machine



Chemicals storage



Eye washing facility



Potable water



Toilet



First aid kit









Business license

Food business licence

Health certificates for the canteen staff





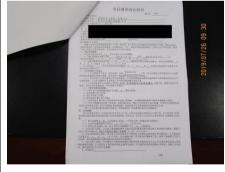


Fire control acceptance check

EIA report

Construction project completion acceptance check







Personnel file

Labour contract

ID card







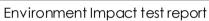


Wage

Attendance record

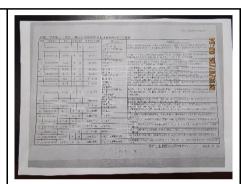
Social insurance receipts







Occupational hazardous factor test report



Occupational disease examination reports



Hazardous waste permission



Hazardous waste disposal contract



Hazardous waste business licence





Drinking water test report



Annual test reports for the elevators



Worker manual







Training record

Fire drill records

Fire drill photo



Special equipment certificates



First aider certificates



Electrician certificates









NC1-the worker contacted with chemicals i.e. glue with not wear protective equipment.





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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:

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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

### **Click here for Auditors:**

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