
Auditee :	Yangjiang Yangdong Guanxiang Industrial and Trade Co., Ltd.
Audit Date From :	08/01/2019
Audit Date To :	08/01/2019
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	ALGI
Auditor's Name(s) :	Zoe Zhang(Lead)
Auditing Branch (if applicable) :	ALGI China



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.
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Rating Definitions



Rating	A combination of ratings per Performance Area where:	Consequence																																							
<p style="text-align: center;">A</p> <p style="text-align: center;">Very Good</p>	<ul style="list-style-type: none"> • Minimum 7 Performance Areas rated A • No Performance Areas rated C, D or E <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	B	B	B	A	A	A	A	A	A	A	B	B	B	B	B	B	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
A	A	A	A	A	A	A	A	A	A	A	A	A																													
A	A	A	A	A	A	A	A	A	A	B	B	B																													
A	A	A	A	A	A	A	B	B	B	B	B	B																													
<p style="text-align: center;">B</p> <p style="text-align: center;">Good</p>	<ul style="list-style-type: none"> • Maximum 3 Performance Areas rated C • No Performance Areas rated D or E <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td></tr> <tr><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td></tr> </table>	A	A	A	A	A	A	B	B	B	B	B	B	B	A	A	A	A	A	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	C	C	C	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
A	A	A	A	A	A	B	B	B	B	B	B	B																													
A	A	A	A	A	B	B	B	B	B	B	B	C																													
B	B	B	B	B	B	B	B	B	B	C	C	C																													
<p style="text-align: center;">C</p> <p style="text-align: center;">Acceptable</p>	<ul style="list-style-type: none"> • Maximum 2 Performance Areas rated D • No Performance Areas rated E <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td></tr> <tr><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td></tr> </table>	A	A	A	A	A	A	A	A	A	C	C	C	C	A	A	A	A	A	B	B	B	B	C	C	C	D	C	C	C	C	C	C	C	C	C	C	C	D	D	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
A	A	A	A	A	A	A	A	A	C	C	C	C																													
A	A	A	A	A	B	B	B	B	C	C	C	D																													
C	C	C	C	C	C	C	C	C	C	C	D	D																													
<p style="text-align: center;">D</p> <p style="text-align: center;">Insufficient</p>	<ul style="list-style-type: none"> • Maximum 6 Performance Areas rated E <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td><td>E</td></tr> <tr><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	D	D	D	A	A	A	B	B	B	C	C	C	D	D	D	E	D	D	D	D	D	D	D	E	E	E	E	E	E	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
A	A	A	A	A	A	A	A	A	A	D	D	D																													
A	A	A	B	B	B	C	C	C	D	D	D	E																													
D	D	D	D	D	D	D	E	E	E	E	E	E																													
<p style="text-align: center;">E</p> <p style="text-align: center;">Unacceptable</p>	<ul style="list-style-type: none"> • Minimum 7 Performance Areas rated E <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>A</td><td>A</td><td>B</td><td>B</td><td>C</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	E	E	E	E	E	E	E	A	A	B	B	C	D	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	<p>amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.</p>
A	A	A	A	A	A	E	E	E	E	E	E	E																													
A	A	B	B	C	D	E	E	E	E	E	E	E																													
E	E	E	E	E	E	E	E	E	E	E	E	E																													
<p style="text-align: center;">Zero Tolerance</p>	<p>A Zero Tolerance issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)</p>	<p>Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.</p>																																							

Main Auditee Information



Name of producer :	Yangjiang Yangdong Guanxiang Industrial and Trade Co., Ltd.		
DBID number :	375901		
Audit ID :	142639		
Address :	No. 3, Shili Industrial Park, Yangdong District, Yangjiang		
Province :	Guangdong	Country :	China
Management Representative :	Mr. Huang Hexiang / Sales Manager		
Contact person:	Hexiang Huang	Sector :	Non-Food
Industry Type :	Plastic Industry	Product group :	Plastic and articles thereof
Product Type :	Plastic products, such as chopping board and nylon kitchenware		

Audit Details



Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input checked="" type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 08/01/2020	

Rating per Performance Area (PA)

PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	A	A	A	B	D	B	A	A	A	A	B	A

Executive summary of audit report

Yangjiang Yangdong Guanxiang Industrial and Trade Co., Ltd. (Local name: 阳江市阳东冠翔工贸有限公司, Unified Social Credit Code: 91441723MA4X5RRU2U) is located at No. 3, Shili Industrial Park, Yangdong District, Yangjiang City, Guangdong Province, China. The factory was established in 2017 and specializes in the manufacturing of plastic products like chopping board and nylon kitchenware. Main production activities include mould-working, injection, assembly and packing. No production process or service is subcontracted. Their main clients are from Europe and America.

The factory consists of three connected 1-storey buildings used as office rooms and production buildings. No dormitory, canteen or kitchen is provided by the factory. There are another 3 rooms in the factory which were used as dormitory before, but currently they are empty. Through worker interviews, all interviewees stated that no dormitory was provided in the factory. The total land area occupied is about 4,000 square meters and the total construction area is 3,200 square meters. On the audit day, there were total 40 employees in the factory, of which 35 employees were production workers. As per management interview, peak season in the factory is not obvious during the last year.

Based on documents review and management interview, it was noted that all employees are paid by hourly rate. Wages are paid in cash at the end date of each month for the preceding month. The factory uses fingerprinting system to keep record of all employees' working hours. All employees work in one shift from 8:00 to 17:30 with lunch break from 12:00 to 13:30 (normally 8 hours per day). Normal working days are from Monday to Friday. Overtime working would be arranged for 2 hours a day from 18:30 to 20:30 on weekdays and for 8 hours a day on Saturdays if needed.

During the current audit, payroll records from December 2017 to November 2018 and attendance records from December 1, 2017 to audit date were provided for review. The auditor randomly selected 7 samples from November 2018 (current month), 6 samples from September 2018 (holiday month) and August 2018 (random month) respectively for verification.

Remark:

- The local legal minimum wage standard has been raised from RMB 1210 per month or equivalent to RMB 6.95 per hour to RMB 1410 per month or equivalent to RMB 8.10 per hour since July 1, 2018.
- The factory did not have government waiver or use subcontractor or agency, and there was also no CBA in the factory, which, therefore, caused that relevant documents required under the Attachment of the report was not applicable.

Ratings Summary



Auditee's background information			
Auditee's name :	Yangjiang Yangdong Guanxiang Industrial and Trade Co., Ltd.	Legal status :	Limited Company
Local Name :	阳江市阳东冠翔工贸有限公司	Year in which the auditee was founded :	2017
Address :	No. 3, Shili Industrial Park, Yangdong District,	Contact person (please select) :	Hexiang Huang
Province :	Guangdong	Contact's Email :	sam@seasung.com
City :	Yangjiang	Auditee's official language(s) for written communications :	Mandarin
Region :	North East Asia	Other relevant languages for the auditee :	Local dialect
Country :	China	Website of auditee (if applicable) :	None
GPS coordinates :	N 21°54'59", E 112°2'24"	Total turnover (in Euros) :	1744439.00
Sector :	Non-Food	Of which exports % :	100.00
Industry :	Plastic Industry	Of which domestic market % :	0.00
If other, please specify :		Production volume :	1,000,000 pieces per year
Product Group :	Plastic and articles thereof	Production cost calculation :	Yes
If other, please specify :		Lost time injury calculation cost :	Yes
Product Type :	Plastic products, such as chopping board and nylon kitchenware		

Auditee's employment structure at the time of the audit			
Total number of workers :	40	Total number of workers in the production unit to be monitored (if applicable) :	0
	MALE WORKERS	FEMALE WORKERS	
Permanent workers	21	19	
Temporary workers	0	0	
In management positions	2	1	
Apprentices	0	0	
On probation	0	0	
With disabilities	0	0	
Migrants (national citizens)	1	3	
Migrants (foreign citizens)	0	0	
Workers on the permanent payroll	21	19	
Production based workers	21	19	
With shifts at night	0	0	
Unionised	0	0	
Pregnant	-	0	
On maternity leave	-	0	

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: D

Deadline date:07/01/2020

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had set up a series of procedures and policies that states their mission, vision and objectives to match the BSCI Code of Conduct and their dedication to comply with social responsibilities. The established procedures and records had included the overall social responsibility policies which consist of anti-discrimination, freedom of association, no child labor, protection for young workers, wages and benefits, working hours, occupational health and safety, environment protection, anti-corruption and etc.; appointment documents for BSCI affair and various of training records such as legal requirements training, health and safety training and etc. The factory had nominated one senior management, Mr. Huang Hexiang / Sales Manager, for the establishment, implementation and maintenance of the BSCI system. However, gaps had been identified in implementation:

整体观察显示,工厂目前部分履行对该区域的要求。工厂建立了表明其使命、愿景和目标的且符合BSCI行为准则和社会责任需要的程序和政策。建立的程序和政策包括总体的社会责任政策比如反歧视、自由结社、禁止雇佣童工、未成年工保护、工资和福利、工作时间、职业健康安全、环境保护、反腐败等,以及BSCI事宜任命书,以及各种培训记录比如法规培训、健康安全培训等。工厂指定了一名高级管理人员(黄合想先生/业务经理)来负责BSCI系统的建立、施行和维护。然而,在实际执行过程中仍然存在问题:

- 1.1 - During this audit, the social management system was proved to be not that effective since some non-compliance issues were detected regarding Workers Involvement and Protection, Fair Remuneration, Decent Working Hours, Occupational Health and Safety and Protection of Environment. Details please refer to Performance Areas 2, 5, 6, 7 and 12.

此次审核中,工厂的社会责任管理体系尚待完善,因为在本次审核中,发现了关于工人参与和保护、公平报酬、体面劳动时间、职业健康与安全 and 环境保护方面的问题。具体请参见区域2、5、6、7和12。

- 1.4 - During this audit, although the factory had made production plan for each order, the workforce capacity in the factory had not been assessed and properly planned to match delivery order contracts' expectations, and the excessive monthly overtime hours were found in this audit.

此次审核中,工厂有对每个订单制定生产计划,但没有正确地对产能进行评估以满足订单的交付预期,并且工人的月加班时间超过了法规的要求。

Remarks from Auditee:

Nil

Performance Area 2 : Workers Involvement and Protection	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:07/01/2020
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>The overall observation showed that the factory partially fulfilled the requirement of this performance area. There was one workers' representative in the factory and relevant election procedures and records were provided for review. BSCI Code of Conduct was displayed on the notice board in the production area. All interviewed workers had a good understanding of their rights and responsibilities. Provided documents indicated that the factory provided regular training to workers on their rights and responsibilities and to management staffs as well as workers' representative on BSCI requirements and other specific requirements like human resources, OHS and the grievance mechanism. The factory periodically conducted internal communication meetings with workers and workers' representative regarding workplace-related issues, and also had set up grievance mechanism which allowed workers to use the mechanism via suggestion box, workers' representative or senior management directly. Satisfactory evidences had shown that workers knew the channels of reflecting their grievances. However, gaps had been identified in implementation:</p> <p>整体观察显示,工厂目前部分履行对该评估区域的要求。工厂选举了一名员工代表,并提供了相关的选举程序和记录。BSCI行为准则张贴在生产区域的公告栏内。通过员工访谈,发现所有被访谈员工很清楚自己的权利和义务。所提供的文件资料显示工厂有定期给员工提供关于其权利和义务的培训,定期给管理人员及员工代表提供关于BSCI要求以及其他具体诸如人力资源、职业健康安全和投诉机制等的培训。工厂定期安排管理层代表和员工以及员工代表就工作场所相关的问题进行内部沟通;同时,建立了员工申诉机制,允许员工通过意见箱、员工代表或者直接找管理者代表反映问题或者意见。充分证据表明员工知道申诉的渠道。然而,在实际执行过程中仍然存在问题:</p> <p>2.4 - Although the factory had posted the BSCI Code of Conduct in workshops, and provided training regarding BSCI Code of Conduct to all employees, through workers interview, all sampled employees could not clearly describe the detailed social compliance requirements.</p> <p>此次审核中,工厂有张贴BSCI行为准则,且有提供有关BSCI行为准则的培训给员工,但是通过员工访谈,所有访谈员工都不清楚社会责任方面的内容和要求。</p>	
Remarks from Auditee: Nil	
Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>None observed</p> <p>The overall observation showed that the factory currently fulfilled the requirements of this performance area. The factory had set up the social policy regarding freedom of association and collective bargaining, which allowed workers to participate associations on their own will if legally permitted and prohibited discriminating those workers for any identity. Workers' representatives were not discriminated but had free access to workers and were encouraged to communicate with workers regarding anything about workers' rights and obligations. The factory facilitated meetings between workers and workers' representatives like the arrangement of meeting time and places.</p> <p>无不符合项发现</p> <p>整体观察显示,工厂目前满足该评估区域的要求。工厂建立了有关自由结社和集体谈判的社会责任政策,尊重员工自由参加法律允许的团体或组织的自由和权利,而且禁止对这些员工有任何歧视的行为。员工代表没有受到歧视,而是可以自由地接近员工并被鼓励积极与员工沟通有关其权利和义务的任何问题。工厂积极促进员工与员工代表的会议比如安排会议时间、提供会议场地等。</p>	
Remarks from Auditee: N/A	

Performance Area 4 : No Discrimination	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: None observed The overall observation showed that the factory fulfilled the requirement of this performance area. The factory had setup the social policy of no discrimination which prohibited discriminating workers for any identity, sex, age, background and etc. Workers had equal opportunities to work overtime, get promotion and receive training. The factory trained human resources department and supervisors that disciplinary measures or dismissals cannot occur based on workers' complaints and workers had no fear of reprisals to submit complaints about infringements of their rights. Disciplinary policy and measures were established within legal frames. 无不符合项发现 整体观察显示, 工厂目前满足该评估区域的要求。工厂建立了反歧视的社会责任政策, 禁止对员工的身份、性别、年龄、背景等进行任何形式的歧视行为。员工有平等加班、晋升和接受培训的机会。工厂有给人力资源部门及各部门主管培训, 强调不能因员工申诉而处罚员工, 员工也表示不担心因为申诉而被报复。工厂的奖惩政策和措施符合法律要求。	
Remarks from Auditee: N/A	
Performance Area 5 : Fair Remuneration	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: B	Deadline date:07/01/2020
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own regulations and rules on wages and benefits based on the legal requirements and BSCI Code of Conduct. As per sampled payroll and attendance records, it was found that the lowest basic wage among samples was RMB 12 per hour. The factory paid 150% and 200% of regular wage rate for overtime hours on weekdays and rest days to workers, which were in compliance with legal requirements. The factory paid wages on time at the end date of each month for the preceding month and pay slips were also provided to workers each month. No monetary fines or other illegal deductions were detected in payroll records. However, the gaps have been identified in implementation: 整体观察表明, 工厂部分履行对该区域要求。工厂基于法律规定和规则以及BSCI行为守则制定了工资和福利制度。根据所抽样员工的工资和考勤记录发现, 在抽样人员中最低的工资为12元/时, 工厂在工作日加班和周末加班会支付正常工资的150%和200%作为加班费。工厂每月月底准时发放工资且有工资条提供。在工资表中没有发现罚款或者其他非法扣款。然而, 在实施过程中仍有差距: 5.4 - During this audit, the wages (basic wage) paid to all sampled workers in August 2018, September 2018 and November 2018 were from RMB 1920 to RMB 2760 per month, which were lower than the local Living Wage. The Living Wage standard of the Downtown of Yangjiang City was RMB 3170.24 each month. 此次审核中, 在2018年8月, 2018年9月和2018年11月, 所有随机抽样员工的工资(基本工资)为1920元至2760元每月, 这低于阳江市城镇地区的基本生活保障工资3170.24元每个月。 5.5 - No employee had participated in any kind of social insurance, which were pension, medical, injury, unemployment and maternity insurances. But the factory had provided commercial injury insurance for all employees. This violated the PRC Labor Law article 72 and 73. Remark: for the reason why no employees had participated in any kind of social insurance, through worker and management interviews, they said that those employees themselves did not want to participate in the social insurance. 工厂目前没有人员参加五种社会保险, 分别是养老、医疗、工伤、失业和生育保险。但是, 工厂为所有的员工购买了商业工伤保险。这违反了《中华人民共和国劳动法》第72条、73条。 备注: 关于没有员工参加5种社会保险的原因, 通过员工及管理层访谈, 他们都表示是员工自己不愿意参加社会保险。	
Remarks from Auditee: Nil	

Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: D

Deadline date:07/01/2020

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own working hour regulations and rules based on the legal requirements and BSCI Code of Conduct. As per on site observation and documents review, the factory used fingerprinting time attendance recording system to record all workers' working hours including overtime hours. As per sampled payroll and attendance records, it was found that all workers worked for 8 hours a day and for 5 days a week as regular working hours. Overtime working was arranged for no more than 3 hours a day on weekdays and for 8 hours a day on Saturdays. One rest day in every 7-day period was guaranteed. And the factory also provided orientation training to new hired workers about the rules on working hours and etc. However, gaps had been identified in implementation:

整体观察显示,工厂目前部分履行对该区域的要求。工厂根据法律要求以及BSCI要求建立了工作时间规章制度。工厂采用指纹考勤系统记录员工的工作时间包括加班时间。根据所抽样员工的工资和考勤记录发现,所有员工的正常工作时间为每天8小时,每周工作五天。加班通常在工作日不超过每天三小时,周六不超过8小时,且能确保连续工作六天后休息一天。同时工厂给新进的员工入职培训有包括关于工作时间的规定。然而,在实际执行过程中仍然存在问题:

- 6.2 - The monthly overtime hours of 6 out of 6 randomly selected employees ranged from 44 to 60 hours in August 2018 (random month), of 6 out of 6 randomly selected employees ranged from 54 to 60 hours in September 2018 (holiday month), and of 7 out of 7 randomly selected employees ranged from 44 to 56 hours in November 2018 (current month), which exceed the legal limitation of 36 hours per month. This violated the PRC Labor Law article 41.

在2018年8月(随机月),随机抽样的6名员工中的6名的月加班工时为44至60小时,在2018年9月(假日月),随机抽样的6名员工中的6名的月加班工时为54至60小时,在2018年11月(当前月),随机抽样的7名员工中的7名的月加班工时为44至56小时,超过了法定要求的每月加班工时不超过36小时的要求。这违反了《中华人民共和国劳动法》第41条。

Remarks from Auditee:

Nil

Performance Area 7 : Occupational Health and Safety

Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: B

Deadline date:07/01/2020

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own health and safety regulations and rules based on the legal requirements and BSCI Code of Conduct and also established OHS committee. The factory had appointed specialized management staff to take charge of the OHS affairs and provided periodical health and safety training to workers regarding such as medical emergency treatment, PPE usage, chemical safety, machine operation, fire drill exercises and etc. Furthermore, the factory provided a safe and comfortable working environment to workers: installing sufficient fire equipment, inspecting the fire equipment and facilities on a monthly basis, providing sufficient toilets, first aid kits, and qualified drinking water, and etc. However, gaps had been identified in implementation:

Remark:

1. 7.21: The factory currently did not provide kitchen or canteen to workers.
2. 7.23: The factory currently did not provide transportation to workers.

整体观察显示,工厂目前部分履行对该区域的要求。工厂根据法律要求以及BSCI的要求建立了健康安全规定和守则,同时也建立了环境健康安全委员会。工厂委任专门的管理层代表负责健康安全事宜并定期给员工举行关于健康安全的培训,比如医疗救护培训、个人防护用品培训、化学品安全培训、机器设备操作培训、消防演习等。另外,工厂给员工提供了安全的工作环境,比如提供了足够的消防设备、对消防设备和器材等每月进行检查、提供了足够的洗手间、急救药箱、合格的饮用水等。然而,在实际执行过程中仍然存在问题:

备注:

1. 7.21: 工厂目前没有给员工提供厨房或者餐厅。
2. 7.23: 工厂目前没有给员工提供交通工具。

- 7.1 -** 1. Although the factory had set up its own occupational health and safety regulations and procedures, the actual practice throughout the facility was not fully in compliance.
2. The raw materials and finished goods in warehouse were being stored against wall. This violated the Rules Concerning Warehouse Safety and Fire Control article 18.

1. 虽然工厂建立了职业健康安全方面的程序和相关制度,但是工厂在实际的执行过程中还存在问题。
2. 工厂仓库中的原料及成品靠墙放置。这违反了《仓库防火安全管理规划》第18条。

- 7.3 -** 1. There were noise, dust and chemical occupational factors existing in mould-working, injection (including mixing and crushing) and assembly & packing workshops, however, the factory did not conduct occupational hazardous factors testing in workshops. This violated the Provisions on the Supervision and Administration of Workplace Occupational Health Article 20.
2. The factory did not provide pre-post, on-post and off-post occupational health checks to the employees who were exposed to the hazardous factors such as noise, dust and chemical factors in mould-working, injection (including mixing and crushing) and assembly & packing workshops. This violated the PRC Law of Prevention and Control of Occupational Diseases article 35.

1. 工厂模具制作、注塑(包含混料和碎料)和组包装车间存在职业危害因素如粉尘、噪音及化学因素,但是工厂没有对这些区域进行职业危害因素检测。这违反了《工作场所职业卫生监督管理规定》第二十条。
2. 工厂未为接触职业危害的员工(模具制作车间和注塑车间的员工(包含混料和碎料的员工)和组包装车间接触噪音、粉尘和化学品的员工)提供入职、在岗和离职的职业健康检查。这违反了《中华人民共和国职业病防治法》第三十五条。

- 7.6 -** The factory provided steel-toed shoes to mould-working workers, but the workers did not wear them during working. The factory provided earplugs to workers exposed to noise in mould-working and injection workshops, but 50% workers did not wear them during working. The factory had provided activated charcoal masks and rubber gloves to workers using chemicals like glue and thinner in assembly & packing workshop, but 50% workers did not wear the activated charcoal masks or wore disposable masks, and all workers did not wear rubber gloves. In addition, the factory did not provide goggles to mould-working and crushing workers exposed to splash. This violated the Law of the PRC on Work Safety article 42.

工厂有提供劳保鞋给到模具车间的员工,但是员工均没有在工作过程中穿着。工厂约50%接触噪音的员工(模具车间的员工和注塑的员工)没有佩戴提供的耳塞。工厂有提供活性炭口罩和橡胶手套给到组包装车间使用化学品(如胶水和白电油)的员工,但是50%的员工没有佩戴活性炭口罩或者佩戴的是一次性口罩,所有的员工都没有佩戴橡胶手套。此外,工厂没有提供防护眼镜给到接触飞溅物的员工(模具制作的员工和碎料的员工)。这违反了《中华人民共和国安全生产法》第42条。

- 7.7 -** The machine oil stored in mould-working and injection workshops and one barrel of glue in assembly and packing workshop were found missing secondary container, and the glue container in assembly & packing workshop was found missing identification label. This violated the Regulations on the Safety Management of Dangerous Chemicals article 20 and the Regulation of Chemical Safety Usage in Workplace, Article 19.

工厂模具及注塑车间存放的机油和组包装车间的一桶胶水没有二次容器,且组包装车间使用的胶水的瓶子上没有粘贴标示。这违反了《危险化学品安全管理条例》第二十条和《工作场所安全使用化学品规定》(劳部发[1996]423号)第19条。

- 7.9 -** Around 5% electricity control panels were found missing warning signs.

工厂约5%的电箱上没有张贴防触电标示。

- 7.11 -** The factory did not provide the fire service inspection records and the certificate or report of acceptance checks for completion of the production buildings. The factory management stated that this was a semi-announced audit, and they had no enough time to contact the landlord to provide

those records on the audit date. This violated the PRC Fire Prevention Law articles 11 & 13 and the PRC Construction Law Article 61.

工厂没有提供其使用厂房的建筑工程验收报告和消防验收报告供审核。工厂解释由于是半通知审核，审核当天无法联系到房东提供资料。这违反了《中华人民共和国消防法》第十一条及第十三条和《中华人民共和国建筑法》第六十一条。

7.13 - Around 50% electricity control panels were found missing inner covers, and the foundation was made of wood for 10% electrical switches. And one electrical switch box in mould-working workshop was found without inner and outer covers. This violated the Safety code of electric power industry—Part1: Thermal and machine Article 3.5.5.

工厂约50%的电箱没有内盖，且10%的电开关是安装在木质底座上，另外，模具车间有一个开关盒没有内外盖。这违反了《电业安全工作规程第1部分：热力和机械》第3.5.5条。

7.17 - Firstly, four drilling machines in mould-working workshop were found missing belt guards. This violated the PRC on Work Safety article 33; Secondly, the welder in mould-working workshop did not have a license. This violated the PRC Labor Law article 55; Thirdly, 7 ladders (with 1.3 to 1.6 meters in height) in injection workshop were found missing handrails. This violated the Safety of machinery - Permanent means of access to machines and industrial plants - Part 3: Stairways, stepladders and guard – rails GB17888.3 -2008.

首先，工厂模具车间有4台钻孔机没有皮带轮保护罩。这违反了《中华人民共和国安全生产法》第33条。其次，工厂没有提供模具车间1名焊工的操作证书。这违反了《中华人民共和国劳动法》第55条。第三，工厂注塑车间7个铁梯（约1.3至1.6米）没有安装扶手。这违反了《机械安全进入机器和工业设备的固定设施 第三部分：楼梯、阶梯和护栏》GB17888.3 -2008。

Remarks from Auditee:

Nil

Performance Area 8 : No Child Labour

Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

None observed.

The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had set up the social policy and procedures on no child labor, age verification mechanism, recruitment procedures and remedial procedures in case children were found. And the factory maintained the personnel files including workers' profiles and copies of age documents for all workers. Through documents review, factory walk-through and worker interviews, no children were found working in the factory currently.

未发现不符合项。

整体观察显示，工厂目前履行对该区域的要求。工厂建立了有关禁止使用童工的社会责任政策和程序、年龄核对机制、招聘程序以及童工补救政策等。同时工厂也保留了所有员工的人事档案以及年龄文件的复印件等。通过文件审核、现场走访以及员工访谈，没有发现工厂有使用童工。

Remarks from Auditee:

N/A

Performance Area 9 : Special protection for young workers

Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A

Deadline date:

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

None observed.

The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had set up the social policy and procedures on young workers' protection and also conducted risk assessment for young workers. Although there was no young worker working in the factory currently, the factory had a clear understanding that young workers were more vulnerable than most workers and stipulated a series of protection rules for young workers, such as, young workers should be adequately protected against any harmful working condition, should not be engaged in night shifts, should have access to effective grievance mechanism, and should be properly trained on OHS, etc.

未发现不符合项。

整体观察显示，工厂目前履行对该区域的要求。工厂建立了有关未成年工保护的社会责任政策和程序，并针对未成年工人做了风险评估。尽管工厂目前没有使用未成年工，但对于未成年工的保护仍有充分的认知，且制定了一系列的未成年工保护规定，比如：不得安排未成年工从事有毒有害的工作，不得安排未成年工上晚班，需要给未成年工提供有效的申诉渠道，需要给未成年工提供有关健康安全的培训，等等。

Remarks from Auditee:

N/A

Performance Area 10 : No Precarious Employment	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: None observed. The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had set up hiring procedures and provided orientation training to workers about their legal rights and responsibilities regarding such as wages and benefits, working hours, occupational health and safety, disciplinary measures, and etc. As per documents review, on-site observation and worker interviews, it was noted that there were no temporary workers, home workers or students at school ages hired by the factory and the factory also did not use dispatched workers. At the same time, the factory signed labor contracts with all workers and also provided copies of the labor contracts to all workers. 未发现不符合项。 整体观察显示, 工厂目前履行对该区域的要求。工厂建立了招聘程序并给新进员工提供了关于合法权利与义务的入职培训, 比如有关工资福利、工作时间、职业健康安全、惩戒措施等。通过文件审核, 现场审核以及员工访谈, 发现工厂没有使用临时员工、家庭工人以及学生工, 所有员工都是工厂直接招聘, 没有使用劳务派遣工。同时, 工厂和所有员工都签订了劳动合同并给员工提供了一份劳动合同副本。	
Remarks from Auditee: N/A	
Performance Area 11 : No Bonded Labour	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: None observed. The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had set up the social policy and procedures on no bonded labor and special training was provided to management particularly supervisors and those in human resources department. As per factory regulations and worker interviews, it was confirmed that workers chose the factory freely without monetary deposit or original personal documents withheld. The factory only kept copies of workers' identification card for documentation purpose in personnel files. There was no restriction on workers' movement, and workers could access to drinking water or toilet facilities as they desired and left the factory freely when they were off duty. All overtime hours were arranged on workers' voluntary basis, and workers could resign from the factory with a one-month prior notice to the factory management. Through on-site observation and worker interviews, no corporal punishment, mental or physical coercion or verbal abuse was found. The factory implemented escalating disciplinary procedures, like verbal warning, written warning and terminations, etc. to discipline workers and explained the details to workers in factory rules. No monetary fines were detected in the disciplinary procedures. 未发现不符合项。 整体观察显示, 工厂目前履行对该区域的要求。工厂建立了关于禁止强迫劳动的社会责任政策和程序, 且为管理人员尤其是主管和人力资源部门的人员提供了专门的培训。通过查看工厂的规章制度以及员工访谈发现, 员工都是自主选择工厂工作, 没有交付押金或者个人证件的原件。工厂仅在人事档案中保留了员工身份证的复印件。员工在工厂内的行动自由, 喝水或使用洗手间或在下班后自由活动都不受限制。加班也是基于员工自愿。如果需要辞职, 只需提前一个月通知管理层即可。通过现场观察和员工访谈, 没有发现体罚、精神或身体胁迫或口头虐待等存在。工厂采用程度逐级提升的惩罚制度, 如口头警告、书面警告、终止合同等来惩罚员工的不恰当行为, 且将这些要求列明在员工手册中。惩处制度中没有发现罚款条款。	
Remarks from Auditee: N/A	

Performance Area 12 : Protection of the Environment	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: B	Deadline date:07/01/2020
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had continuously identified the significant impacts and environmental implications associated to its activities and carried out the impact assessment regularly. Policies and procedures were established to incorporate relevant environmental laws and there was a designated staff responsible for collecting and updating relevant regulations and laws. However, gaps had been identified in implementation:</p> <p>整体观察显示, 工厂目前部分履行对该区域的要求。工厂能持续识别与其经营活动相关的重要环境影响和因素, 并定期进行环境影响评估。根据其适用的环境法规, 建立了相关的政策和程序文件并指定了专门的负责人负责相关环境法规的收集和更新。然而, 在实际执行过程中仍然存在问题:</p> <p>12.3 - The factory did not compile Environmental Impact Report, Environmental Impact Report Form or fill out Environmental Impact Registration Form as per the local law (Remark: The factory had authorized a qualified 3rd company to compile Environmental Impact Report, and provided the contract for review during this audit). This violated the PRC Environmental Impact Assessment Law (2016) Article 16.</p> <p>审核中发现工厂没有按照法规要求组织编制环境影响报告书、环境影响报告表或者填报环境影响登记表(备注:工厂已经与有资质的第三方签订了环评报告表撰写的合同, 并提供合同书供审阅)。这违反了《中华人民共和国环境影响评价法(2016)》第16条。</p> <p>12.4 - There were hazardous wastes such as waste organic solvent, empty chemical containers and etc. generated during daily production, however, the factory did not sign a disposal contract with a qualified collector to dispose those hazardous wastes (chemicals such as glue, thinner, machine oil were used during daily production.). This violated PRC Law of Prevention and Treatment of Environmental Pollution by Solid Wastes, Article 57.</p> <p>工厂在生产过程中会产生危险废物如废有机溶剂、废化学品空桶等, 但是工厂没有委托有资质的第三方收集处理这些废弃物(生产过程中有使用胶水、白电油、机油等化学品)。这违反了《中华人民共和国固体废物污染环境防治法》第57条。</p>	
Remarks from Auditee: Nil	
Performance Area 13 : Ethical Business Behaviour	
Full Audit [Audit Id - 142639] Audit Date: 08/01/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>None observed.</p> <p>The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had identified the situations and activities where act of corruption, extortion and embezzlement were most likely to occur and developed relevant policies and procedures against them. During the audit process, all required documents were provided timely and as per cross checking, no inconsistent or falsified information was detected. The factory also established a set of procedures to avoid, investigate and discipline any fraud, falsification and misrepresentation in the supply chain. Further, the factory collected and processed workers' personal data with respect for privacy.</p> <p>未发现不符合项。</p> <p>整体观察显示, 工厂目前履行对该区域的要求。工厂识别了各种可能存在贪污、勒索和侵占的情形及行为并制定了相关的反腐败、反贪污的政策和程序。在审核过程中, 工厂及时提供了所要求的所有文件和信息且在交叉核对时没有发现不一致或者伪造的信息。同时, 工厂建立了一系列程序以避免、调查和惩罚任何欺骗、伪造及虚假陈述的行为。此外, 在收集和处理工人的个人信息时, 工厂确保了对个人隐私的保护。</p>	
Remarks from Auditee: N/A	

Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	08/01/2019	142639	D	A	A	A	B	D	B	A	A	A	A	B	A	C

Producer Photos





Photo of fire safety equipment
Evacuation plan.JPG



Photo of the inside of the main production hall
Mixing.JPG



Photo of non-conformity
NC-glue container without label.JPG



Photo of fire safety equipment
Fire alarm testing.JPG



Photo of the inside of the main production hall
Mould-working-1.JPG



Photo of non-conformity
NC-goods stored against wall.JPG



Photo of fire safety equipment
Fire alarm.JPG



Photo of the inside of the main production hall
Mould-working-4.JPG



Photo of non-conformity
NC-ladder without handrail.JPG



Photo of fire safety equipment
Fire extinguisher monthly inspection records.JPG



Photo of the inside of the main production hall
Raw material and finished goods warehouse.JPG



Photo of non-conformity
NC-mould-working worker without steel-toe shoes or goggle and did not wear the provided earplugs.JPG



Photo of fire safety equipment
Fire extinguisher.JPG



Photo of the inside of the main production hall
Suggestion box.JPG



Photo of non-conformity
NC-one barrel of glue without secondary container.JPG

