



Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC402928653	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS402938733	
Business name (Company name):	Xiamen Zaifeng Sporting Equipment Company Limited			
Site name:	Xiamen Zaifeng Sporting Equipment Company Limited			
Site address:	The 3-5 Floor, No. 999 North Tongji Road, Nishan Li, Yangzhai Village, Xiangping Street, Tongan District Xiamen 361100 CN	Country:	CN	
Site contact and job title:	Ms. Wu Bingbing / Administration Manager			
Site phone:	0592-7100083	Site e-mail:	audits@hkangel.com	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar	<input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2023-12-18			

Audit Company Name:
Eurofins China

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Henry Han	APSCA Number:	21700623
Additional Auditors:			
Date of declaration:	2023-12-20		

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

Site Representation	
Full Name:	Ms. Wu Bingbing
Title:	Administration Manager
Date of declaration:	2023-12-20
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
Nil	

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	1	GE - ZAF600288859
3 - Working conditions are safe and hygienic	3.1 3.1 3.2	§1 §2 §3	3	0	1	NC - ZAF600288855 NC - ZAF600288856 NC - ZAF600288860 GE - ZAF600288858
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive	6.1	§4	1	0	0	NC - ZAF600288857
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2-pillar			0	0	0	
10B4 - Environment 4-pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	<p>In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.</p> <p>依据《工作场所安全使用化学品规定》第十二条，使用单位使用的化学品应有标识，危险化学品应有安全标签，并向操作人员提供安全技术说明书。</p>

§2	<p>In accordance with the General rules for fire safety management in storage places (GA1131-2014):6.7 the goods stored in the warehouse shall be classified, piled and stored within limits. The area of each stack should not be greater than 150 m. The width of the main passageway in the warehouse should not be less than 2m. 6.8 the stacking items in the warehouse shall meet the following requirements: A) the distance between the upper part of the stacking and the floor and flat roof shall not be less than 0.3m (from the beam of the herringbone roof truss); B) the distance between the article and the light shall not be less than 0.5m; E) the distance between the articles and the wall shall not be less than 0.5m; D) the distance between the stacking and the column shall not be less than 0.3m; E) the distance between stacking and stacking shall not be less than 1 m.</p> <p>《仓储场所消防安全管理通则》(GA1131-2014): 6.7 库 房内储存物品应分类、分堆、限额存放。每个堆垛的面 积不应大于150 m²。库房内主通道的宽度不应小于2m。《仓储场所消防安全管理通则》(GA1131-2014): 6.8 库 房内堆放物品应满足以下要求: a) 堆垛上部与楼板、平屋顶之间的距离不小于0.3 m (人字屋架从横梁算起); b) 物品与照明灯之间的距离不小于0.5 m; e) 物品与墙之间的距离不小于0.5 m; d) 物品堆垛与 柱之间的距离不小于0.3 m; e) 物品堆垛与堆垛之间 的距离不小于1 m。</p>
§3	<p>In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.</p> <p>依据《中华人民共和国安全生产法》第42条, 生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品, 并监督、教育从业人员按照使用规则佩戴、使用。</p>
§4	<p>In accordance with the PRC Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</p> <p>依据《中华人民共和国劳动法》第41条, 用人单位由于 生产经营需要, 经与工会和劳动者协商后可以延长工作 时间, 一般每日不得超过一小时; 因特殊原因需要延长工作时间的, 在保障劳动者身体健康的条件下延长工作 时间每日不得超过三小时, 但是每月不得超过三十六小 时。</p>

Site Details

Site Details		
Company Name	Xiamen Zaifeng Sporting Equipment Company Limited	
Site Name	Xiamen Zaifeng Sporting Equipment Company Limited	
GPS location (if available)	GPS Address:	The 3-5 Floor, NO.999 North Tongji Road, Nishanli, Yangzhai Village, Xiangping Street, Tong'an District, Xiamen City, Fujian Province, China
	Coordinates:	Lon: 118.149684, Lat: 24.707458
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license registration number is: 91350212791290808C	
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Manufacturing of baseball, softball and baseball gloves etc sporting goods.	
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Xiamen Zaifeng Sporting Equipment Company Limited. is located at The 3-5 Floor, NO.999 North Tongji Road, Nishanli, Yangzhai Village, Xiangping Street, Tong'an District, Xiamen City, Fujian Province, China. The total area occupied by the facility is about 46000 square meters. The facility is established on December 25, 2006. In view of the facilities, the facility consists of partial of the 2/F and the whole 3/F to 6/F of one 6-storey production building, which are used as production workshops, warehouse, and office. The 1/F of the building is rented by Xiamen Fengji Automobile Trading Co., Ltd as 4S Auto Shop, and rest area of the 2/F is idle. During the document review, the independent renting contract and business licenses were provided for review.	

Structure and number of buildings	Building Name:		Production building
	Floor	Description	Remark
	Floor 1	Xiamen Fengji Automobile Trading Co., Ltd. as 4S Auto Shop.	Year of establishment: 2008
	Floor 2	Idle, Office	Year of establishment: 2008
	Floor 3	Ball manufacturing workshops	Year of establishment: 2008
	Floor 4	Glove manufacturing workshops	Year of establishment: 2008
	Floor 5	Material warehouse	Year of establishment: 2008
	Floor 6	RD department	Year of establishment: 2008
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No crack or visible structural integrity issues was observed.		
Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The building construction completion acceptance report issued by building structural licenses issued by local government department was provided for review.		
Site function	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor		
Months of peak season			
Process overview	The main products manufactured by the facility are baseball, softball and baseball gloves etc sporting goods. The main production processes for gloves are: Cutting, Sewing, Pad printing / Heat transfer printing, Inspection and Packing. The main production processes for baseball and softball are: Cutting, Gluing, Laminating, Pad printing/Heat transfer printing, Cotton filling, Hand sewing, Inspection and Packing. The main production equipment list of the facility is as following: Cutting machines, needle detecting machines, Sewing machines, Packing machines, Punching machines, Pad printing machines, Heat transfer printing machines and packing machines.		

What form of worker representation is there on site?	<input checked="" type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Xiamen Zaifeng Sporting Equipment Company Limited union, and worker representatives
Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: NA. No accommodation was provided by the facility.

Audit Parameters						
Time in and time out	Day 1		Day 2		Day 3	
	In	09:00	In	09:00	In	09:00
	Out	17:00	Out	17:00	Out	14:00
Audit type:	FULL_INITIAL					
Was the audit announced?	SEMI_ANNOUNCED					
Was the Sedex SAQ available for review?	Yes					
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No					
Who signed and agreed CAPR	Ms. Wu Bingbing / Administration Manager					
Is further information available	No					

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	Yes
B: Present at the audit?	Yes	Yes	Yes
C: Present at the closing meeting?	Yes	Yes	Yes
<i>Reason for absence at the opening meeting</i>			
<i>Reason for absence during the audit</i>			
<i>Reason for absence at the closing meeting</i>			

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	14	0	0	15	0	0	0	29
Worker numbers – female	61	0	0	24	0	0	0	85
Total	75	0	0	39	0	0	0	114
Number of Workers interviewed – male	1	0	0	5	0	0	0	6
Number of Workers interviewed – female	14	0	0	6	0	0	0	20
Total – interviewed sample size	15	0	0	11	0	0	0	26

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

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	4 groups of 5 interviewees per group, total 20 employees
Number of individual interviews:	Male: 1 Female: 5
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Wages were always paid on time
Any additional comment(s) regarding interviews:	No
Attitude of workers to hours worked:	The working hours were acceptable and the overtime was voluntary. They sometimes wanted to work extra to earn more money.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

Attitude of workers:

Total 26 employees including 6 male employees and 20 female employees were selected for interview, the 20 employees were interviewed as 4 groups and the balance of 6 employees were interviewed individually. All the interviewee employees claimed they were satisfied with working condition of the facility and were free to leave the facility, they also claimed that they had good relationships with their supervisors and managers, they could make suggestion to their supervisors and team leaders freely. Moreover, they could complain directly to their supervisors, worker representative, top managements or feedback through suggestion box, email, and WeChat etc.

Attitude of worker's committee/union reps:

The interviewed union representative and worker representative claimed that they were elected by workers, and they were not discriminated against to carry out their representative functions in workplace, they were satisfied with the facility's management and working conditions, no complaint or grievance related this code was reported by workers.

Attitude of managers:

The facility management gave the full access to all necessary areas for facility tour, and a private room was arranged for employees' interview. They were interested in audit process. They were able to discuss queries and issues found in open and honest manner. At the end of the audit, all the findings were accepted by the facility managements.

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

0A: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had documented policy and procedure covering human rights impacts and issues, which was endorsed by General Manager, the policy included the commitment of respecting human rights.
- Administration Manager/ Ms. Wu was responsible for implementing standards concerning Human rights.
- The facility communicated its policies and practices including human rights impacts and issues to its employees through internal training and communicated to other stakeholders through posters and email.
- The facility identified their stakeholders and salient issues.
- The facility conducted annual internal assessment and management review to measure their direct, indirect, and potential impacts on stakeholders.
- The facility established a documented remediation procedure to ensure their stakeholders who have an adverse impact on human rights will be addressed and enable effective remediation.
- Employees could freely report issues related to human rights impacts to the top management directly or feedback through suggestion box with anonymity without fear of reprisals towards the reporter.

Evidence examined:

- Facility policy and procedure concerning Human rights
- Appointed letter
- Training records during past one year
- Stakeholders map
- Supplier communication and evaluation records
- Internal assessment and management review records
- Management interview
- Employee interview

Any other comments:

None

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

The policy was signed by General Manager and included in employee manuals.

Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policies were included in workers' manuals and the facility had provided training to workers on the policies.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Administration Manager/ Ms. Wu was responsible for implementing standards concerning Human Rights.
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Documented policy and procedure for confidentially reporting, and dealing with human rights impacts was in place, according to the documents, the facility encouraged employees to confidentially report, and deal with human rights impacts, and administration Manager was the designed person for managing the transparent system.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Documented data privacy procedure was in place, and facility appointed an HR staff to manage confidential information including workers' information such as personnel records.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 8.0% This year 9.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 3.0% This year 3.0%

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	1.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Administration department kept the record of accidents, but based on the documents and management interview, no accident was happed during past year.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%

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

0B: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility implemented and maintained procedures & policies for delivering compliance to this code.
- No evidence that the facility had been subjected to any fines/prosecutions for non-compliance to any regulation was found.
- Vice General Manager, Ms. Cai was the responsible person for the compliance with the code.
- The facility communicated this code to all employees through internal training and posters.
- The facility required their suppliers to sign written commitments to ensure this code to be understood and followed.
- The facility had no system certification.

Evidence examined:

- Appointed letter.
- Procedures & policies for delivering compliance to this Code.
- Training records in past one year.
- Business license
- Property ownership certificate of the facility building.
- Commitments letter signed by the facility's suppliers.
- Management interview
- Employee interview.
- Facility tour

Any other comments:

None

Management Systems

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

☐ Yes ☒ No

Please give details:

No such case was found during this assessment

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

☒ Yes ☐ No

Please give details:

The policies and procedures were included in employees' social compliance manual, which were provided to each employee through orientation training.

If Yes, is there evidence (an indication) of effective implementation? Please give details.	Though employment contract and ID copies review, no child labour under the age of 16 years old employed. Through on-site observation, employee interview and documentation review, no indication of forced labour, child labour, discrimination, harassment, or abuse was found.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The standards for forced labour, child labour, discrimination, harassment, and abuse were provided to employees through orientation training and were provided to manager through periodic training.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Training material and training records in past one year was provided for review, and the interviewed employees claimed that they had received the training.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No internationally recognised system certification was provided for review.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The department manager was Ms. Wu
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Ms. Cai/ Vice General Manager was appointed to be responsible for the implementation of the code.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Documented worker information privacy policy and data privacy policy was in place.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility appointed a specify administration staff to manage confidential information.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had undertaken yearly risk assessments to evaluate policy and procedure effectiveness, besides, onsite supervisors had conducted periodically health and safety check to ensure the risk can be identified.

Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through reviewing the risk assessments, it was noted that effective action had been taken to reduce or eliminate these risks.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had documented supplier social compliance management procedure, which required suppliers to establish their labour standards and procedures, besides, written commitments were signed by its suppliers to ensure this code to be understood and followed.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility showed the auditor their leasing agreement in original form records. The house property certificate and land use certificate etc legal required documents were provided for review during this audit.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The facility had such policy and appointed a qualified administration staff to collect and communicate the national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The land in China mainland belongs to the nation. Anybody or facility, no matter the character, can only rent the land from governmental department for a period. If the facility would like to use the land, it should apply for it from governmental department. The governmental department would make decision on whether to provide the approval.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: This was conducted by the local governmental authority and the owner purchased the lease according to legal channels, overseen by company legal advisors.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Not applicable. The land was bought from the local government without land acquisition from other, currently, the facility did not have plan of land acquisition.

<p>Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The valid land use certificate and the property ownership certificates of the facility building were provided for review during this audit. All the areas of facility were legal according to the interview and document review.</p>
--	--

1 - Freely chosen Employment

[Summary of Findings]

1: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had documented policy and procedure to ensure employment is freely chosen.
- Administration Manager, Ms. Wu was responsible for communicating, deploying, and monitoring the practices of effectively prohibiting involuntary or forced labour.
- Employees were not restricted to resign after legal notice.
- The facility did not detain employee's identity card or other certificates, nor require employee to provide a guaranty or collect property under any other excuse.
- No clause about forced, bonded labour was found in employment contracts.
- The facility issued wages and compensation to employees directly, no deposit or illegal payment withholding was noted in payroll records.
- No sign of employees being under pressure was found during the facility tour.

Evidence examined:

- Facility policy on employment is freely chosen.
- Appointed letter.
- Hiring procedure.
- Resignation records in past one year.
- Payroll records from November 2022 to October 2023.
- 26 randomly selected employees' personnel files
- 26 randomly selected employees' employment contracts.
- Management interview
- Employee interview
- Facility tour.

Any other comments:

None

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Through reviewing the resignation records and employee interview, it was noted that the freedom of employment termination was not restricted.

<p>If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>This was not applicable for this facility.</p>
<p>Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details:</p> <p>Through employee interview, the workers' freedom was not restricted.</p>
<p>Does the site understand the risks of forced / trafficked / bonded labour in its supply chain</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable</p> <p>Please give details:</p> <p>The facility conducted annual assessments for its business partners to understand the risks of forced, trafficked, or bonded labour in its supply chain.</p>
<p>Is the site taking any steps taking to reduce the risk of forced / trafficked labour?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility had established relevant policies and procedures and conducted annual assessments for its business partners to reduce the risk of forced / trafficked labour in its supply chain.</p>

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

[Summary of Findings]

2: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had a policy to recognize and respect the right of employees to exercise their lawful rights of free association.
- Employees could freely communicate issues related to working condition, wage & benefits, and Freedom of Association etc. to managements directly, through regularly meeting with top management or posting their documented issues into suggestion box etc.
- There was one union in the facility, union representatives were elected freely by workers.
- The facility had documented policy to ensure facility management and union representatives conduct meetings periodically.

Evidence examined:

- Site policy on Freedom of Association.
- Training records.
- Facility tour
- Meeting minutes between top management and employees.
- Worker committee election records and meeting minutes.
- Management interview
- Employee interview

Any other comments:

None

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)

- ☒ Union ☒ Worker Committee
☐ Other ☐ None

Other details:

There were union representatives and worker representatives in the facility, who were elected freely by workers.

Is it a legal requirement to have a union?

- ☐ Yes ☒ No

Is it a legal requirement to have a worker's committee?

- ☐ Yes ☒ No

Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)

- ☒ Yes ☐ No

Please give details:

Suggestion box, WeChat and email, regularly meeting with facility managements or report to management directly etc.

Is there evidence of free elections?

- ☒ Yes ☐ No

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Meeting room was available for the union and committee to conduct related business.
Name of union and union representative, if applicable:	Union name: Xiamen Zaifeng Sporting Equipment Company Limited Union
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	N/A
Is there evidence of free elections?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Union and worker representatives were elected by workers, all workers aware of who their representatives are. This was confirmed through worker interview
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-05-11
Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	2.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Meetings were conducted between the facility management and union and worker representatives. The last meeting between the facility management and worker representative was held on 7th December 2023. The topic including the summary of the company's operation in recent months. The meeting minutes were communicated to all employees via poster.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Good Example		Evidence																		
[Back to findings summary]																				
<table><tr><th colspan="2">Good Example</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600288859</td></tr><tr><td>Clause</td><td>2 - Freedom of Association and Right to Collective Bargaining are Respected</td></tr><tr><td>Issue Title</td><td>133 - Worker representatives (e.g. unions) involved throughout the audit</td></tr><tr><td>Subcategory</td><td>Worker dialogue</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Explanation to the good example</td><td>During this audit, one worker representative was involved throughout the audit</td></tr><tr><td>Evidence</td><td>On site observation and worker representative interview</td></tr></table>		Good Example		Status	OPEN	Reference	ZAF600288859	Clause	2 - Freedom of Association and Right to Collective Bargaining are Respected	Issue Title	133 - Worker representatives (e.g. unions) involved throughout the audit	Subcategory	Worker dialogue	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	During this audit, one worker representative was involved throughout the audit	Evidence	On site observation and worker representative interview	
Good Example																				
Status	OPEN																			
Reference	ZAF600288859																			
Clause	2 - Freedom of Association and Right to Collective Bargaining are Respected																			
Issue Title	133 - Worker representatives (e.g. unions) involved throughout the audit																			
Subcategory	Worker dialogue																			
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																			
Explanation to the good example	During this audit, one worker representative was involved throughout the audit																			
Evidence	On site observation and worker representative interview																			

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

3: Compliance Requirements

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

General health and safety management:

- The facility established documented policies and procedures to ensure safe and hygienic working environment shall be provided.
- The facility appointed a safety manager to be responsible for the facility's health and safety conditions.
- Ventilation, temperature, and lighting were adequate for the production processes.

Fire and building safety:

- Evacuation plans indicating necessary information were posted in each workshop of the facility.
- Firefighting equipment such as fire extinguishers, fire hydrants and fire alarms were installed in relevant areas of the facility according to legal requirements.
- Firefighting equipment in the facility were kept unblocked and were easily accessible.
- There were at least 2 exits from each work area.
- All evacuation passages and exits in workshops of the facility were clear and unlocked.
- Fire drills were organised every 6 months and recorded.
- Smoking was not permitted inside/throughout the facility building.

Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches.
- The electrical system in the facility was in a good condition, and all switches in the electrical control panels were labelled.

Equipment safety

- The facility posted warning signs wherever high-risk machines.
- The operators of safety devices received sufficient training.
- The facility had registered the special appliance (cargo lift) at the Special Appliance Quality Safety Monitoring Department, and the proper registration certificate and valid inspection report were obtained.

Medical and hygiene

- First aid kits stocked with sufficient necessary supplies were available in each workshop.
- There were trained first aiders in the facility, the first aid procedure and the contact number of the first aiders were posted in each workshop.
- Employees could access to clean toilet facilities and to potable water anytime.
- Sufficient clean toilets segregated by gender were available at all the time to workers.
- Potable water testing report was provided for review, and no non-compliance was noted in the water testing report.

Chemical safety

- All the dangerous chemicals and flammable material were stored away from sources of ignition.
- The Material Safety Data Sheet of the chemicals were posted in in local language at workplaces where dangerous chemicals were used. Employees who use the chemicals can also find the MSDS on site.
- Employee exposed to chemicals confirmed that they had been trained on chemical safety.

Some NC findings were also noted in this audit, please find NC description for details.

Evidence examined:

- Facility policy on health and safe.
- Appointed letter.
- Potable water testing report.
- Emergency response plan.
- Fire drill records.
- First-aider certificates.
- Cargo lift registration certificate
- Cargo lift inspection report
- HS risk assessment records
- Building structure safety certificate
- Fire safety certificate
- Occupational hazards test report
- Health and safety training records and training material in past one year.
- Chemical list and MSDS for chemical used by the facility.
- Facility tour
- Management interview
- Employee interview.

Any other comments:


None

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The policies and procedures were in place and were communicated to workers through poster and training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: This was conformed through reviewing policy manual.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Through on-site observation, it was noted that the facility had no structural addition without required permits..
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Visitors to the site were informed on H&S
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No medical room in the facility and no such legal requirement, but first aid kits stocked with sufficient necessary supplies were available in each workshop.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Trained first aiders were available in the facility, the first aid procedure and the contact number of the first aiders was posted in each workshop. No legal requirement of requiring doctor or nurse on site.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. The facility did not provide worker transport to workers.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. The facility did not provide dormitory to workers.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Delivered as part of the internal social audit, last delivered in March 2023.


Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No finding against legal requirements in environment area was found during this audit.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No special customer requirement was applicable, and no finding against legal requirements in environment area was found during this audit.

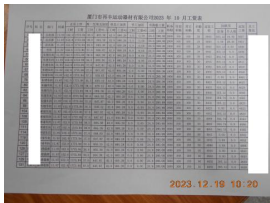
Non-Compliance		Evidence																													
[Back to findings summary]																															
<table border="1"> <thead> <tr> <th colspan="2">Non-Compliance</th> </tr> </thead> <tbody> <tr> <td>Status</td> <td>OPEN</td> </tr> <tr> <td>Reference</td> <td>ZAF600288855</td> </tr> <tr> <td>Clause</td> <td>3 - Working Conditions are Safe and Hygienic</td> </tr> <tr> <td>Issue Title</td> <td>230 - No material safety data sheet (MSDS) obtained / available</td> </tr> <tr> <td>Subcategory</td> <td>Chemicals</td> </tr> <tr> <td>New or carried over?</td> <td> <input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over </td> </tr> <tr> <td>Root cause</td> <td> <input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other </td> </tr> <tr> <td>Root cause - Other</td> <td></td> </tr> <tr> <td>Local law issue</td> <td> <p>In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.</p> <p>依据《工作场所安全使用化学品规定》第十二条，使用单位使用的化学品应有标识，危险化学品应有安全标签，并向操作人员提供安全技术说明书。</p> </td> </tr> <tr> <td>ETI code</td> <td>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.</td> </tr> <tr> <td>Explanation to the non compliance</td> <td> <p>Through on site observation, it was noted that dangerous chemicals such as paint and organic solvent were used at the pad printing workshop. However, no MSDS (Material Safety Data Sheet) was provided at the workplace.</p> <p>审核发现企业移印车间有使用油墨和有机溶剂，但该场所没有相应危险化学品的MSDS（物质安全技术资料表）。</p> </td> </tr> <tr> <td>Follow up method</td> <td> <input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit </td> </tr> <tr> <td>Timescale</td> <td> <input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> <input type="checkbox"/> </td> </tr> </tbody> </table>			Non-Compliance		Status	OPEN	Reference	ZAF600288855	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	230 - No material safety data sheet (MSDS) obtained / available	Subcategory	Chemicals	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	<p>In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.</p> <p>依据《工作场所安全使用化学品规定》第十二条，使用单位使用的化学品应有标识，危险化学品应有安全标签，并向操作人员提供安全技术说明书。</p>	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	Explanation to the non compliance	<p>Through on site observation, it was noted that dangerous chemicals such as paint and organic solvent were used at the pad printing workshop. However, no MSDS (Material Safety Data Sheet) was provided at the workplace.</p> <p>审核发现企业移印车间有使用油墨和有机溶剂，但该场所没有相应危险化学品的MSDS（物质安全技术资料表）。</p>	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> <input type="checkbox"/>	
Non-Compliance																															
Status	OPEN																														
Reference	ZAF600288855																														
Clause	3 - Working Conditions are Safe and Hygienic																														
Issue Title	230 - No material safety data sheet (MSDS) obtained / available																														
Subcategory	Chemicals																														
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																														
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																														
Root cause - Other																															
Local law issue	<p>In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.</p> <p>依据《工作场所安全使用化学品规定》第十二条，使用单位使用的化学品应有标识，危险化学品应有安全标签，并向操作人员提供安全技术说明书。</p>																														
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.																														
Explanation to the non compliance	<p>Through on site observation, it was noted that dangerous chemicals such as paint and organic solvent were used at the pad printing workshop. However, no MSDS (Material Safety Data Sheet) was provided at the workplace.</p> <p>审核发现企业移印车间有使用油墨和有机溶剂，但该场所没有相应危险化学品的MSDS（物质安全技术资料表）。</p>																														
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																														
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> <input type="checkbox"/>																														

	365 days	Other	
Actions	It is recommended that the facility should ensure MSDS is available for hazardous chemical in the workplace. 建议企业应在相关场所提供物质安全资料表。		

Non-Compliance		Evidence																							
[Back to findings summary]																									
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600288856</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>327 - Storage of goods not in line with legal requirements (e.g. too high)</td></tr><tr><td>Subcategory</td><td>Hygiene Facilities & Housekeeping</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td><p>In accordance with the General rules for fire safety management in storage places (GA1131-2014):6.7 the goods stored in the warehouse shall be classified, piled and stored within limits. The area of each stack should not be greater than 150 m. The width of the main passageway in the warehouse should not be less than 2m. 6.8 the stacking items in the warehouse shall meet the following requirements: A) the distance between the upper part of the stacking and the floor and flat roof shall not be less than 0.3m (from the beam of the herringbone roof truss); B) the distance between the article and the light shall not be less than 0.5m; E) the distance between the articles and the wall shall not be less than 0.5m; D) the distance between the stacking and the column shall not be less than 0.3m; E) the distance between stacking and stacking shall not be less than 1 m.</p><p>《仓储场所消防安全管理通则》(GA1131-2014): 6.7 库内储存物品应分类、分堆、限额存放。每个堆垛的面积不应大于150 m²。库内主通道的宽度不应小于2m。 《仓储场所消防安全管理通则》(GA1131-2014): 6.8 库内堆放物品应满足以下要求: a) 堆垛上部与楼板、平屋顶之间的距离不小于0.3 m (人字屋架从横梁算起); b) 物品与照明灯之间的距离不小于0.5 m; e) 物品与墙之间的距离不小于0.5 m; d) 物品堆垛与 柱之间的距离不小于0.3 m; e) 物品堆垛与堆垛之间 的距离不小于1 m。</p></td></tr><tr><td>ETI code</td><td>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,</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600288856	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	327 - Storage of goods not in line with legal requirements (e.g. too high)	Subcategory	Hygiene Facilities & Housekeeping	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	<p>In accordance with the General rules for fire safety management in storage places (GA1131-2014):6.7 the goods stored in the warehouse shall be classified, piled and stored within limits. The area of each stack should not be greater than 150 m. The width of the main passageway in the warehouse should not be less than 2m. 6.8 the stacking items in the warehouse shall meet the following requirements: A) the distance between the upper part of the stacking and the floor and flat roof shall not be less than 0.3m (from the beam of the herringbone roof truss); B) the distance between the article and the light shall not be less than 0.5m; E) the distance between the articles and the wall shall not be less than 0.5m; D) the distance between the stacking and the column shall not be less than 0.3m; E) the distance between stacking and stacking shall not be less than 1 m.</p> <p>《仓储场所消防安全管理通则》(GA1131-2014): 6.7 库内储存物品应分类、分堆、限额存放。每个堆垛的面积不应大于150 m²。库内主通道的宽度不应小于2m。 《仓储场所消防安全管理通则》(GA1131-2014): 6.8 库内堆放物品应满足以下要求: a) 堆垛上部与楼板、平屋顶之间的距离不小于0.3 m (人字屋架从横梁算起); b) 物品与照明灯之间的距离不小于0.5 m; e) 物品与墙之间的距离不小于0.5 m; d) 物品堆垛与 柱之间的距离不小于0.3 m; e) 物品堆垛与堆垛之间 的距离不小于1 m。</p>	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable,	<div><p><u>Packing materials were stored against the wall.JPG</u></p></div>
Non-Compliance																									
Status	OPEN																								
Reference	ZAF600288856																								
Clause	3 - Working Conditions are Safe and Hygienic																								
Issue Title	327 - Storage of goods not in line with legal requirements (e.g. too high)																								
Subcategory	Hygiene Facilities & Housekeeping																								
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																								
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																								
Root cause - Other																									
Local law issue	<p>In accordance with the General rules for fire safety management in storage places (GA1131-2014):6.7 the goods stored in the warehouse shall be classified, piled and stored within limits. The area of each stack should not be greater than 150 m. The width of the main passageway in the warehouse should not be less than 2m. 6.8 the stacking items in the warehouse shall meet the following requirements: A) the distance between the upper part of the stacking and the floor and flat roof shall not be less than 0.3m (from the beam of the herringbone roof truss); B) the distance between the article and the light shall not be less than 0.5m; E) the distance between the articles and the wall shall not be less than 0.5m; D) the distance between the stacking and the column shall not be less than 0.3m; E) the distance between stacking and stacking shall not be less than 1 m.</p> <p>《仓储场所消防安全管理通则》(GA1131-2014): 6.7 库内储存物品应分类、分堆、限额存放。每个堆垛的面积不应大于150 m²。库内主通道的宽度不应小于2m。 《仓储场所消防安全管理通则》(GA1131-2014): 6.8 库内堆放物品应满足以下要求: a) 堆垛上部与楼板、平屋顶之间的距离不小于0.3 m (人字屋架从横梁算起); b) 物品与照明灯之间的距离不小于0.5 m; e) 物品与墙之间的距离不小于0.5 m; d) 物品堆垛与 柱之间的距离不小于0.3 m; e) 物品堆垛与堆垛之间 的距离不小于1 m。</p>																								
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable,																								

	the causes of hazards inherent in the working environment.	
Explanation to the non compliance	<p>It was noted that about 10% of packing materials in warehouses were stored against the wall, the distance between material and the wall was nearly zero, which was lower than the distance of 0.5 meters stipulated by local law.</p> <p>审核发现企业仓库中约10%的包材靠墙存放，低于当地法律规定的0.5米的距离。</p>	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	<p>It is recommended that the facility should ensure the distance between material and the wall was not lower than the distance of 0.5 meters stipulated by local law.</p> <p>建议企业应确保材料与墙体之间的距离不低于当地法律规定的0.5米。</p>	

Non-Compliance		Evidence																															
[Back to findings summary]																																	
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600288860</td></tr><tr><td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr><tr><td>Issue Title</td><td>278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate</td></tr><tr><td>Subcategory</td><td>Personal Protective Equipment/Clothing</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment. 依据《中华人民共和国安全生产法》第42条，生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。</td></tr><tr><td>ETI code</td><td>3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.</td></tr><tr><td>Explanation to the non compliance</td><td>Through on site observation, it was noted that the one gluing employee in gluing area in ball workshop did not wear gloves, although the facility had provided the PPE to the employee. 通过现场巡视，发现3楼涂胶区一名涂胶员工没有佩戴企业提供的企业手套。</td></tr><tr><td>Follow up method</td><td><input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit</td></tr><tr><td>Timescale</td><td><input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other</td></tr><tr><td>Actions</td><td>It is recommended that the facility should supervise and train the employees on properly wearing PPE. 建议企业应监督、教育员工正确使用劳保用品。</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600288860	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Subcategory	Personal Protective Equipment/Clothing	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment. 依据《中华人民共和国安全生产法》第42条，生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。	ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.	Explanation to the non compliance	Through on site observation, it was noted that the one gluing employee in gluing area in ball workshop did not wear gloves, although the facility had provided the PPE to the employee. 通过现场巡视，发现3楼涂胶区一名涂胶员工没有佩戴企业提供的企业手套。	Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	Actions	It is recommended that the facility should supervise and train the employees on properly wearing PPE. 建议企业应监督、教育员工正确使用劳保用品。	<div><p>Employee did not wear glove.JPG</p></div>
Non-Compliance																																	
Status	OPEN																																
Reference	ZAF600288860																																
Clause	3 - Working Conditions are Safe and Hygienic																																
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate																																
Subcategory	Personal Protective Equipment/Clothing																																
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																																
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																																
Root cause - Other																																	
Local law issue	In accordance with Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment. 依据《中华人民共和国安全生产法》第42条，生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。																																
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.																																
Explanation to the non compliance	Through on site observation, it was noted that the one gluing employee in gluing area in ball workshop did not wear gloves, although the facility had provided the PPE to the employee. 通过现场巡视，发现3楼涂胶区一名涂胶员工没有佩戴企业提供的企业手套。																																
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other																																
Actions	It is recommended that the facility should supervise and train the employees on properly wearing PPE. 建议企业应监督、教育员工正确使用劳保用品。																																

Good Example	Evidence																		
<p>[Back to findings summary]</p> <table> <tr> <th colspan="2">Good Example</th></tr> <tr> <td>Status</td><td>OPEN</td></tr> <tr> <td>Reference</td><td>ZAF600288858</td></tr> <tr> <td>Clause</td><td>3 - Working Conditions are Safe and Hygienic</td></tr> <tr> <td>Issue Title</td><td>377 - Free or subsidised accommodation for workers</td></tr> <tr> <td>Subcategory</td><td>Accommodation Living Conditions</td></tr> <tr> <td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr> <tr> <td>Explanation to the good example</td><td>It was noted that the facility provided accommodation allowance of RMB 100 per month for all of the sampled employees</td></tr> <tr> <td>Evidence</td><td>Payroll records, management interview and worker interview</td></tr> </table>	Good Example		Status	OPEN	Reference	ZAF600288858	Clause	3 - Working Conditions are Safe and Hygienic	Issue Title	377 - Free or subsidised accommodation for workers	Subcategory	Accommodation Living Conditions	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Explanation to the good example	It was noted that the facility provided accommodation allowance of RMB 100 per month for all of the sampled employees	Evidence	Payroll records, management interview and worker interview	 <p>Samples of payroll records.jpg</p>
Good Example																			
Status	OPEN																		
Reference	ZAF600288858																		
Clause	3 - Working Conditions are Safe and Hygienic																		
Issue Title	377 - Free or subsidised accommodation for workers																		
Subcategory	Accommodation Living Conditions																		
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																		
Explanation to the good example	It was noted that the facility provided accommodation allowance of RMB 100 per month for all of the sampled employees																		
Evidence	Payroll records, management interview and worker interview																		

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

4: Compliance Requirements

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

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

Current Systems:

- The facility had documented policies and procedures pertaining to prohibiting child labour.
- Administration Manager was the responsible person for communicating, deploying, and monitoring child labour procedure
- Documented child labour remediation program was established according to the requirement of ETI Base Code.
- The facility retained proof of age for each employee and maintained the information in the employee's personnel file.
- No new or historic recruitment of child labour was found during this audit, the youngest employee in the facility was 24 years old.

Evidence examined:

- Facility policy on prohibition of using child labour
- Hiring procedure.
- Appointed letter.
- 26 randomly selected employees' personal records.
- Employee roster
- Facility tour
- Management interview
- Employee interview

Any other comments:

None

Legal age of employment:	16
Age of youngest worker found:	24
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No worker in the facility was under 18 years old.

5 - Living Wages are Paid [Summary of Findings]

5: Compliance Requirements

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The local legal minimum wage was set at RMB 2030 per month, equivalent to RMB 11.67 per hour since 1st April 2022.
- The Administration Manager was appointed to be responsible for communicating, deploying, and monitoring the wage and benefits system.
- Through employee interview and crosschecking the attendance records, payroll records, leave records, Resignation records, Personnel records, Production Daily Records, QC Inspection Records and Material In/Out Records, no inconsistency was found.
- Based on the provided payroll records and employee interview, it was noted that:
 - a)The minimum normal wage paid for the samples were RMB 2030 per month, equivalent to RMB 11.67 per hour, which was in line with the local minimum wage standard.
 - b)150% and 200% of normal rate wages were paid by the facility to employees for overtime on normal working days and rest days respectively. There was no overtime on official public holidays.
- All employees' wages are calculated on hourly-rate basis paid monthly on or before the 25th day of each month after the working period.
- Through reviewing the facility policies, training records and employee interview, it was noted that all employees had been provided with written and understandable information about their employment conditions in respect to wages before they enter employment.
- Annual leave, sick leaves, social insurances and legal holidays were provided to all eligible employees according to law requirement.

Evidence examined:

- Attendance records from 1st November 2022 to 18th December 2023 and payroll records from November 2022 to October 2023 were provided for review.
- 26 attendance and payroll records in October 2023 (current month), 26 attendance and payroll records in July 2023 (random month), 26 attendance and payroll records in April 2023 (random month) were randomly selected for review.
- Appointed letter.
- Facility policy and regulation on wages and benefits
- Labour contracts, Resignation records, Leave records and Production related records.
- Local legal minimum wage standard updated in April 2022.
- Social insurances receipts of the latest three months, Insurances participated name lists.
- Employees' interview.
- Management interview

Any other comments:

None

Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 184.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 18.0 Per Month: 82.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 2030.0	Actual Per Day: 93.0 Per Week: 467.0 Per Month: 2030.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: null Per Week: null Per Month: null	NO
Wages Analysis:			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	26 samples in October 2023 (current month) 26 samples in July 2023 (random month) 26 samples in April 2023 (random month)		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	RMB 2030 per month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Post allowance: RMB 1000 - 2000 per month for all selected employees. Full attendance bonus: RMB 50 per month Housing and meal allowances: RMB 200 per months Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Social insurances (basic endowment insurance, employment injury insurance, basic medical insurance, unemployment insurance and maternity insurance) and personal income tax.		

Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Please list all deductions that have been made.	Social insurances Personal income tax
Please list all deductions that have not been made.	N/A
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Attendance records were complete, and no inconsistency was found.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Facility conducted annual review of its wages level to ensure the wages of the facility was not lower than average level of local city.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through facility rules review, payroll records review and employees' interview, it was confirmed that equal rates are being paid for equal work.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

6 - Working Hours are not Excessive

[Summary of Findings]

6: Compliance Requirements

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

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

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

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Administration Manager was appointed to be responsible for communicating, deploying, and monitoring the working hour system

- Through employees' interview, overtime was voluntary.

- Through employee interview and crosschecking the attendance records, payroll records, Leave Records, Resignation Records, Personnel Records, Production Daily Records, QC Inspection records and Material In/Out Records, no inconsistency was found.

- Based on the provided attendance records and employee interview, it was noted that:

- a) The normal working hour of all samples were 8 hours per day and 40 hours per week.

- b) The status of overtime hours in samples were as below:

Daily:

0 to 2 hours/ day in October 2023(current month)

0 to 2 hours/ day in July 2023 (random month)

0 to 2 hours/ day in April 2023 (random month)

Monthly:

76.5 to 80 hours/ month in October 2023 (current month)

78 to 82 hours/ month in July 2023 (random month)

71.5 to 78 hours/ month in April 2023 (random month)

For the NC finding details, please find NC description in Findings area.

Evidence examined:

- Attendance records from 1st November 2022 to 18th December 2023 and payroll records from November 2022 to October 2023 were provided for review.

- 26 attendance and payroll records in October 2023 (current month), 26 attendance and payroll records in July 2023 (random month), 26 attendance and payroll records in April 2023 (random month) were selected.

- Appointed letter.

- Besides the payroll and attendance records, other records such as Facility regulation, Facility policy, labour contracts, Resignation records, Leave records and Production related records were provided for crosschecking the wages and working hours.

- Employees' interview.

- Management interview


Any other comments:

None

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Facial ID
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days <input type="checkbox"/> 2 in 14 days <input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Overtime Hours worked	

Actual overtime hours worked in sample (State per day/week/month)	<p>Highest OT hours:</p> <p>Daily: 2 hours/ day in October 2023 (current month) 2 hours/ day in July 2023 (random month) 2 hours/ day in April 2023 (random month)</p> <p>Weekly: 18 hours/ week in October 2023 (current month) 18 hours/ week in July 2023 (random month) 18 hours/ week in April 2023 (random month)</p> <p>Monthly: 80 hours/ month in October 2023 (current month) 82 hours/ month in July 2023 (random month) 78 hours/ month in April 2023 (random month)</p>
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Please give details: The highest weekly working hours of the samples were 58 hours</p>
Approximate percentage of total workers on highest overtime hours:	31.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information</p> <p>Please give details: Through employee interview, all interviewee claimed that overtime was voluntary.</p>
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium</p> <p>Please give details: 150% of standard wages were paid employees for overtime on normal working days, 200% of standard wages were paid employees for overtime on rest day and no overtime on statutory holidays</p>
Is overtime paid at a premium?	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>All samples were paid sufficient overtime on normal working days and rest days and there was no overtime on statutory holidays, the overtime wages were paid monthly on or before the 25th day of each month after the working period.</p>
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.	<p><input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements</p> <p><input checked="" type="checkbox"/> Other</p>
Please give details	N/A, as the facility did not pay less than 125% OT premium.

<p>If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)</p>	<div> <input type="checkbox"/> Overtime is voluntary <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary <input type="checkbox"/> Safeguards are in place to protect worker's health and safety </div> <div> <input type="checkbox"/> Site can demonstrate exceptional circumstances <input checked="" type="checkbox"/> Other reasons (please specify) </div>
<p>Please give details</p>	<p>Not applicable, as total working hour per week did not exceed 60 hours.</p>
<p>Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other</p>	<p>Not applicable, as total working hour per week did not exceed 60 hours.</p>
<p>Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No This was confirmed through management interview</p>
<p>If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>

Non-Compliance		Evidence																									
[Back to findings summary]																											
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ZAF600288857</td></tr><tr><td>Clause</td><td>6 - Working Hours are not Excessive</td></tr><tr><td>Issue Title</td><td>480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive</td></tr><tr><td>Subcategory</td><td>Overtime</td></tr><tr><td>New or carried over?</td><td><input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td><p>In accordance with the PRC Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</p><p>依据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。</p></td></tr><tr><td>ETI code</td><td>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.</td></tr><tr><td>Explanation to the non compliance</td><td><p>It was noted that the monthly overtime hours of 26 out of 26 randomly selected employees ranged from 76.5 to 80 hours in October 2023 (current month), 26 out of 26 randomly selected employees ranged from 78 to 82 hours in July 2023 (random month) and 26 out of 26 randomly selected employees ranged from 71.5 to 78 hours in April 2023 (random month).</p><p>审核发现，在2023年10月（当前月），26名随机选择的员工中26名员工的月加班时间在76.5至80小时之间，在2023年7月（随机月），26名随机选择的员工中26名员</p></td></tr></table>			Non-Compliance		Status	OPEN	Reference	ZAF600288857	Clause	6 - Working Hours are not Excessive	Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive	Subcategory	Overtime	New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		Local law issue	<p>In accordance with the PRC Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</p> <p>依据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。</p>	ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	Explanation to the non compliance	<p>It was noted that the monthly overtime hours of 26 out of 26 randomly selected employees ranged from 76.5 to 80 hours in October 2023 (current month), 26 out of 26 randomly selected employees ranged from 78 to 82 hours in July 2023 (random month) and 26 out of 26 randomly selected employees ranged from 71.5 to 78 hours in April 2023 (random month).</p> <p>审核发现，在2023年10月（当前月），26名随机选择的员工中26名员工的月加班时间在76.5至80小时之间，在2023年7月（随机月），26名随机选择的员工中26名员</p>	<div><p>Samples of attendance records.pdf</p></div>
Non-Compliance																											
Status	OPEN																										
Reference	ZAF600288857																										
Clause	6 - Working Hours are not Excessive																										
Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive																										
Subcategory	Overtime																										
New or carried over?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Carried Over																										
Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input checked="" type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other																										
Root cause - Other																											
Local law issue	<p>In accordance with the PRC Labour Law article 41, the employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.</p> <p>依据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。</p>																										
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.																										
Explanation to the non compliance	<p>It was noted that the monthly overtime hours of 26 out of 26 randomly selected employees ranged from 76.5 to 80 hours in October 2023 (current month), 26 out of 26 randomly selected employees ranged from 78 to 82 hours in July 2023 (random month) and 26 out of 26 randomly selected employees ranged from 71.5 to 78 hours in April 2023 (random month).</p> <p>审核发现，在2023年10月（当前月），26名随机选择的员工中26名员工的月加班时间在76.5至80小时之间，在2023年7月（随机月），26名随机选择的员工中26名员</p>																										

	工的月加班时间在78至82小时之间，在2023 年4月（随机月），26名随机选择的员工中26名员工的月加班时间在71.5至78小时之间。
Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other
Actions	<p>It is recommended that the facility should reduce the overtime hours to ensure it is within 36 hours per month.</p> <p>建议企业应减少员工的加班时间确保每月的加班时间不超过36小时。</p>

7 - No Discrimination is Practiced [Summary of Findings]

7: Compliance Requirements

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had a documented policy which stipulated the facility shall prohibit any kind of discrimination in hiring, compensation, access to training, promotion, termination, or retirement.
- Facility's policy, practices and procedures on discriminatory behaviour was effectively communicated to all employees through internal training.
- Through payroll records review, facility policy review and employee interview, employees with the same job and seniority were paid with the same rate irrespective of gender, age, or other issues.

Evidence examined:

- Facility policy on prohibition of discrimination.
- Training records and training material in past one year.
- Payroll records from November 2022 to October 2023.
- Management interview and employee interview

Any other comments:

None

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 40.0%			Female: 60.0%		
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	6 females are in development and laboratory analyst posts					
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<input type="checkbox"/> Hiring		<input type="checkbox"/> Compensation		<input type="checkbox"/> Access to training	
	<input type="checkbox"/> Promotion		<input type="checkbox"/> Termination or retirement		<input checked="" type="checkbox"/> No evidence of discrimination found	
Please give details	No evidence of discrimination was found during this audit					
Professional Development						
What type of training and development are available for workers?	Operation skill training and management skill training was provided to workers to support professional development					
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					

8 - Regular Employment Is Provided [Summary of Findings]

8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

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

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

8.5 Employment agencies must only supply workers registered with them.

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had documented policy and procedure pertaining to regular employment, which stipulated that the employment in the facility should follow national law and practice.
- The facility signed labour contract with employees within one month of their induction, and one copy of the labour contract was provided to the employees.
- Wages, benefits and working hour etc. terms & conditions were clearly defined in contracts.
- No home-working or contracted employees were used by this facility.
- All employees were hired by the facility directly.
- No foreign employees in the facility. All migrant employees were from other provinces of China.

Evidence examined:

- Facility policy on the regular employment.
- 26 selected employees' labour contracts.
- Employee roster
- Employees' interview.
- Management interview

Any other comments:

None

Responsible Recruitment

All Workers

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Terms & Conditions presented | <input checked="" type="checkbox"/> Understood by workers |
| <input checked="" type="checkbox"/> Same as actual conditions | |

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Migrant Workers	
Type of work undertaken by migrant workers:	All types of work in the facility including office and production workshops
Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Migrant employees all come from other provinces in China such as Sichuan, Jiangxi and Hubei, all deduction for the employees were legal and voluntary.
Is there any observation on this finding?	No. All deduction for the employees were legal and voluntary.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No There was total 39 migrant employees in the facility, all types of work were applicable for migrant employees, including management roles.
Non-employee workers	
Recruitment Fees	
Are there any fees?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A, there was no non-employee worker in the facility.
Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is there a legal contract agreement with all agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. No agency was used by the facility.
Does the site have a system for checking labour standards of agencies?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A. No agency was used by the facility.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	

Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no any contractors on site.
Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There was no any contractors on site.

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

Through document review, facility tour, management interview and employee interview, it was noted that no subcontracting or home-working was used by this facility.

Evidence examined:

- Facility tour
- Management interview
- 26 employees were randomly selected for interview.

Any other comments:

None

Summary of sub-contracting – if applicableIs there any sub-contracting at this site? ☐ Yes ☒ No**Summary of homeworking – if applicable**Is homeworking used at this site? ☐ Yes ☒ No

9 - No Harsh or Inhumane Treatment is Allowed
[Summary of Findings]

9: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had a documented policy pertaining to prohibiting inhumane treatment, which stipulated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation should always be prohibited in the facility.
- The facility's policy, practices, and procedures on prohibiting inhumane treatment were effectively communicated to all employees through internal training.
- The interviewed employees claimed that published, anonymous and open channels were available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party, this was also confirmed through reviewing the facility policy and procedures.

Evidence examined:

- Written policy on the prohibiting inhumane treatment.
- Training records and training material in past on year
- Employees' interview.
- Management interview.

Any other comments:

None

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: <ul style="list-style-type: none"> • There was suggestion box, and an internal confidential email address for reporting grievances. • Telephone number of local fire safety management department and police station was posted in common areas of the facility, which was available for employees to report violation of grievances to local fire safety or public security department through their mobile phone.
If yes, are workers aware of these channels and have access? Please give details.	All the 26 interviewed employees claimed they were aware of the channels.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Email, WeChat, suggestion box and telephone
Which of the following groups is there a grievance mechanism in place for?	<input checked="" type="checkbox"/> Worker <input checked="" type="checkbox"/> Communities <input checked="" type="checkbox"/> Suppliers <input type="checkbox"/> Other

Please provide grievance mechanism details	<ul style="list-style-type: none"> •Internet communication tools such as email, WeChat and suggestion box was available for employees to report issues including labour standards and H&S or any other grievances to the top management directly. •Suppliers and communities could report labour standards and H&S or any other grievances to the facility management through telephone or email.
Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:

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

10A: Compliance Requirements

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

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had a documented policy pertaining to entitlement to work and immigration, which stipulated that the facility only used employees with legal right to work.
- The facility's policy, practices and procedures on work and immigration was effectively communicated to all employees.
- There were no agency staffs, foreign employees, employment agencies in the facility, and all migrant employees came from other provinces of China.

Evidence examined:

- Written policy on entitlement to work and immigration.
- Training records and training material in past one year.
- Employees' interview.
- Management interview

Any other comments:

None

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

10B4: Compliance Requirements

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

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

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

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

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

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

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

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

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

10B4: Guidance for Observations

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

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

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

Current Systems and Evidence Examined

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

Current Systems:

- Through management interview, it was noted that the facility managements were aware of legal and clients' environmental requirements.
- The factory had policy and procedures pertaining to environmental protection, which stipulated that the factory should comply with the requirements of local and international laws.
- Administration Manager was appointed to be responsibility for communicating, deploying, and monitoring the environment practices elaborated upon in the environmental management system
- No evidence that the facility had been subjected to any fines/prosecutions for noncompliance to environmental regulations in the past one year.
- The facility had a program and materials to train relevant individuals on each practice of the environmental management system.
- The factory had obtained legal required Environmental Impact Report and Environmental protections Acceptance check report as per legal requirement.

Evidence examined:

- Training records and training material in past one year.
- Factory policy and procedures on environmental protection.
- Appointed letter issued.
- Environmental Impact Report, which is approved by local administrative department of environmental protection.
- Environmental protections Acceptance check report, which shows that the completed construction project of the factory is approved by local administrative department of environmental protection.
- Facility tour
- Employee interview
- Management interview

Any other comments:

None

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Ms. Wu/ Administration Manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessments on the environmental impact of the facility were conducted by internal staff and external 3rd party. The records were provided for review.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The facility did not have recognised environmental system certification.
Does the site have an Environmental policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, is it publicly available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If yes, does it address the key impacts from their operations and their commitment to improvement?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The commitment to improvement was signed by General Manager of the facility.
Does the site have a Biodiversity policy?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No such system was present.
Have all legally required permits been shown?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Legally required permits such as Environmental Impact Assessment approval and environmental protection acceptance check report was provided for review.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The inventory of hazardous chemicals used in the manufacturing process was in place, the last updated on October 31, 2023.

Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Environment management system representative was appointed to be responsible for managing client's requirements and legislation in the destination countries regarding environmental and chemical issue.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Reduction targets for electricity usage and water usage per unit (both were 2% per year) were established to reduce costs. The reduction target was included in the Environmental policy.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Waste recycling records were kept and reviewed by facility management to monitor volume of waste.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Water meters and electricity meters were in place for measuring and monitoring consumption of key utilities of water and energy.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No subcontracting agency was used by the facility, but the facility had monitored its business partners' operation on environmental performance through on site visits.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	346694	329100
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Local water authority	Local water authority
Water Volume Used	2860	2572
Water Discharged	Municipal sewage treatment plant	Municipal sewage treatment plant
Water Volume Discharged	2860	2572
Water Volume Recycled	0	0
Total waste produced	12.5 tons	12.6 tons

Total hazardous waste produced	0.18 ton	0.1 ton
Waste to recycling	5 tons	5.2 tons
Waste to landfill	7.5 tons	7.4 tons
Waste to other	0.18 ton	0.1 ton
Total Product Produced	Gloves: 200000 pieces, Softball and baseball: 200000 Gloves: 200000 pieces, Softball and baseball: 200000	

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

10C: Compliance Requirements

10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,

10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C: Guidance for Observations

10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

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

Current Systems and Evidence Examined

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

Current Systems:

- The facility had policy and procedures pertaining to anti-bribery, anti-corruption, or unethical Business.
- Facility President was appointed to be responsibility for communicating, deploying, and monitoring the standards concerning business ethics
- Through management interview, it was noted that the facility managements were aware of legal and clients' business ethics requirements.
- The facility communicated this business ethics policy to all employees through internal training.
- The facility had received and read the Business Ethics policy of the audit company and that facility' practices were conducted without any corruption or bribery during this audit.

Evidence examined:

- Facility policy and procedures on anti-bribery, anti-corruption, or unethical Business.
- Appointed letter.
- Training records and training material in past one year.
- Management interview
- Employee interview

Any other comments:

None

<p>Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?</p>	<p><input checked="" type="checkbox"/> Internal Policy</p> <p><input checked="" type="checkbox"/> Policy for third parties including suppliers</p> <p>Please give details:</p> <p>The business ethics policy for employees and third parties were in place, which was signed by top management of the facility. Through reviewing training records and employee interview, it was noted that it was communicated to employees according to the policy.</p>
<p>Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The training records during past one year was documented and provided for review</p>
<p>Is the policy updated on a regular (as needed) basis?</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility conducted annual management review to ensure the social compliance policies and procedures including the business ethics policy was updated and was in compliance with local law requirements.</p>
<p>Does the site require third parties including suppliers to complete their own business ethics training</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Please give details:</p> <p>The facility communicated their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate third parties and required their third to sign written commitments to ensure this policy to be understood and followed.</p>

Attachments



CH_FSI_2_Xiamen Zaifeng Sporting Equipment
Company Limited_Xiamen Zaifeng Sporting
Equipment Company
Limited_ASSMETA1_Photo_report.docx



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

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](https://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

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

[Click here for Supplier \(B\) members:](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

[http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d](https://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

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