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Auditee :	<b>Wenzhou Sunmax International Trade Co., Ltd.</b>
Audit Date From :	<b>24/03/2020</b>
Audit Date To :	<b>24/03/2020</b>
Expiry Date of the Audit :	<b>Please refer to the producer profile in the amfori BSCI platform</b>
Auditing Company :	<b>BureauVeritas</b>
Auditor's Name(s) :	<b>James Cheng(Lead)</b>
Auditing Branch (if applicable) :	

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This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.  
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This is an extract of the amfori BSCI Audit Report, which is available in the amfori BSCI Platform. © amfori, 2018 - The English version is the legally binding One.

**Rating Definitions**



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

**Main Auditee Information**



Name of producer :	<b>Wenzhou Sunmax International Trade Co., Ltd.</b>		
DBID number :	<b>350533</b>		
Audit ID :	<b>176065</b>		
Address :	<b>No.5 Qingsong Road, Ouhai Economic Development Zone Wenzhou</b>		
Province :	<b>Zhejiang</b>	Country :	<b>China</b>
Management Representative :	<b>Mr. Zhan Dezhi, Admin Manager</b>		
Contact person:	<b>Dezhi Zhan</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Accessories</b>	Product group :	<b>Glassware (eyewear)</b>
Product Type :	<b>Sunglasses, reading glasses</b>		

**Audit Details**



Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 24/03/2021	

Rating per Performance Area (PA)												
PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
B	B	A	A	A	D	A	A	A	A	A	B	A

**Executive summary of audit report**

There were 2 enterprises at the audited address.

A: Wenzhou Sunmax International Trade Co., Ltd. (温州尚麦国际贸易有限公司)  
Address in business license: East 3rd floor, 1st building, No.5, Qingsong Road, Ouhai Economic Development Zone, Wenzhou (温州市瓯海经济开发区青松路5号第一幢第三层东首)  
Business license number: 91330304344083305L

B: Wenzhou Jutai Glasses Co., Ltd. (温州巨泰眼镜有限公司)  
Address in business license: Building 2, No.5 Qingsong Road, Ouhai Economic Development Zone, Wenzhou (浙江省温州市瓯海经济开发区青松路5号第二幢).  
Business license number: 91330304681682624L

Both legal representatives for these two business license were same person. A business license was responsible for sales. B business license was responsible for production.

The auditee chose to use English name of A business license and Chinese name of B business license in amfori BSCI platform. So the audit scope covered both business licenses.

The auditee chose to use English address "No.5 Qingsong Road, Ouhai Economic Development Zone, Wenzhou" which was same as formal invoice provided to foreign customer.

The factory was established on November 10th, 2008 and specialized in manufacturing Sunglasses and reading glasses. The main production activities included injection, polishing, assembling, paint spraying and packing. The peak season was not obvious.

The auditee mainly consisted of one 3-storey production building, and one 4-storey canteen, dormitory and office building. Total construction area occupied by the auditee was about 5000 square meters.

There were totally 47 employees in the factory (male: 23, female: 24), including 9 non-production employees and 38 production employees. The youngest employee working in the factory was 19 years old.

Production workers' working hours were recorded by finger printing machine with detailed time in and time out information. There was 1 shift arranged for all production workers: 8:00~12:00, 13:30~17:30. Production workers were paid at hourly rate before the end of the following month in cash.

According to the review of the 15 sample population employees' wage records and 20 sample population employees' attendance records (5 samples each from January 2020, October 2019 and August 2019, and 5 samples from the yet-to-pay month February 2020), it was noted that all sampled employees were paid at least RMB13.85 per hour, which was not lower than the local legal minimum wage requirement of RMB11.55 per hour since December 2017. All employees were paid 150% of normal wage for overtime worked on weekdays and 200% of normal wage for overtime worked on rest days; which is in compliance with the local law; no overtime on holidays was noted. The maximum overtime working hours was 2 hours a weekday and 56 hours a month. The maximum weekly working hours were 52 hours. The longest consecutive working days were 6 days.

According to the social insurance payment receipt provided by factory management, it was noted that only 13 out of 47 (27.65%) employees were provided with pension, medical, unemployment, maternity and accident insurance in February 2020. Factory had provided the rest employees with group accident insurance, which was valid from August 10th, 2019 to August 09th, 2020.

Confidential interviews were conducted with 5 employees from different workshops. All employees were satisfied with the working condition.

At the end of the audit, a closing meeting was held with the factory representatives. All of the findings were disclosed and discussed and a corrective action plan was explained to the factory representatives. Mr. Zhan Dezhi, Admin Manager, agreed with the findings and signed the corrective action plan.

Opening meeting factory representatives (name and titles)

Mr. Zhan Dezhi, Admin Manager

Mr. Yang Jiyun, OHS Manager

Ms. Jiang Haiyan, Worker Representative

Remark:

1. There are no agencies or contractor used by the auditee, which makes the contractor license and agency labor contract not applicable. No government waiver was obtained by the factory. No collective bargaining agreement was available.

2. Audit Company: Bureau Veritas Consumer Products Service

Audit Company APSCA Number: 11600002

Lead Auditor Name: James Cheng

APSCA Auditor Registered Number: RA21702362

**Ratings Summary**



<b>Auditee's background information</b>			
Auditee's name :	<b>Wenzhou Sunmax International Trade Co., Ltd.</b>	Legal status :	<b>Private Company</b>
Local Name :	<b>温州巨泰眼镜有限公司 (91330304681682624L)</b>	Year in which the auditee was founded :	<b>2008</b>
Address :	<b>No.5 Qingsong Road, Ouhai Economic Development Zone</b>	Contact person (please select) :	<b>Dezhi Zhan</b>
Province :	<b>Zhejiang</b>	Contact's Email :	<b>2881033160@qq.com</b>
City :	<b>Wenzhou</b>	Auditee's official language(s) for written communications :	<b>Chinese</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>English</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>None</b>
GPS coordinates :	<b>N27°58'4" E120°39'27"</b>	Total turnover (in Euros) :	<b>4500000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>1.00</b>
Industry :	<b>Accessories</b>	Of which domestic market % :	<b>0.00</b>
If other, please specify :		Production volume :	<b>4000000 pairs per year</b>
Product Group :	<b>Glassware (eyewear)</b>	Production cost calculation :	<b>No</b>
If other, please specify :		Lost time injury calculation cost :	<b>No</b>
Product Type :	<b>Sunglasses, reading glasses</b>		

<b>Auditee's employment structure at the time of the audit</b>		
Total number of workers :	<b>47</b>	Total number of workers in the production unit to be monitored (if applicable) :
		<b>0</b>
	<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>
Permanent workers	<b>23</b>	<b>24</b>
Temporary workers	<b>0</b>	<b>0</b>
In management positions	<b>3</b>	<b>2</b>
Apprentices	<b>0</b>	<b>0</b>
On probation	<b>0</b>	<b>0</b>
With disabilities	<b>0</b>	<b>0</b>
Migrants (national citizens)	<b>23</b>	<b>24</b>
Migrants (foreign citizens)	<b>0</b>	<b>0</b>
Workers on the permanent payroll	<b>23</b>	<b>24</b>
Production based workers	<b>0</b>	<b>0</b>
With shifts at night	<b>0</b>	<b>0</b>
Unionised	<b>0</b>	<b>0</b>
Pregnant	<b>-</b>	<b>0</b>
On maternity leave	<b>-</b>	<b>0</b>

**Finding Report**



**Performance Area 1 : Social Management System and Cascade Effect**

Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: B

Deadline date:24/05/2020

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The auditee partially respects the requirement of this performance area. The facility had established management system to implement Amfori BSCI Code of Conduct. Mr. Zhan/ Admin Manager, was appointed as BSCI management representative to ensure all codes would be strictly followed. The facility established the procedure on supplier management, and also evaluated the main partners' social performance annually. Amfori BSCI Code of Code and TOI were communicated with the partners. The facility conducted BSCI internal audit and management review regularly to check the effectiveness of the management system, latest BSCI internal audit was conducted on July 10th, 2019. However, gaps had been identified in implementation.

被审核方部分遵守本执行领域要求。工厂建立了管理体系来贯彻Amfori BSCI行为准则。工厂任命了詹先生/行政经理为BSCI管理者代表来确保所有条款的严格实施。工厂建立了供应商管理程序，并且每年评估主要合作伙伴的社会责任绩效。Amfori BSCI行为准则及商业伙伴专用实施条款已传达给其合作伙伴。工厂定期开展了BSCI内审和管理评审来检验管理体系的有效性，最近一次BSCI内审是在2019年7月10日举行的。然而，工厂在实施中仍存在差距。

- 1.4 - It was noted that although the factory established the production capacity assessment procedure, the production capacity assessment was not conducted. And workers overtime hours exceeded the statutory overtime hour limits. This violated Performance Area 1: Social Management System and Cascade Effect 1.4.

工厂虽然建立了生产能力评估程序，但生产能力评估没有进行，员工加班时间超出了法规要求。根据执行领域1：社会责任管理体系和级联效应1.4。

**Remarks from Auditee:**

None

**Performance Area 2 : Workers Involvement and Protection**

Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: B

Deadline date:24/04/2020

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The auditee partially respects the requirement of this performance area. The facility had established policy on worker involvement and protection. Moreover, the facility ensured worker involvement by establishing detailed procedures and trainings on worker representative and grievance mechanism. Worker representatives were elected by workers publicly and fairly and quarterly communication meeting record with the management were provided for review. The annual training covered workers' rights and responsibilities, Health & Safety and facility rules. The auditee had an effective grievance mechanism; the mechanism consisted of using suggestion box, worker representation and etc. With regard to the reported cases, the management would take time to handle the issues. Interviewed workers reported that they were clear about the grievance procedure in the facility, but they were satisfied with their working condition in the facility, thus there was no grievance in the past 12 months. Relevant documents were maintained and provided for review. Amfori BSCI COC with poster had been posted in the workshops and all employees can read freely. However, gaps had been identified in implementation.

被审核方部分遵守本执行领域要求。工厂建立了员工参与和保护的政策，通过员工代表和申诉机制方面的具体的程序和培训来确保员工的参与。员工代表由员工公开公平选举，工厂提供了员工代表和管理层季度沟通的会议记录。年度的培训内容涵盖员工的权利和责任，健康安全以及厂纪厂规。工厂有一个有效的申诉机制，包括：意见箱、员工代表等。对于所有上报的案例，工厂管理人员会花时间处理。受访员工表示他们清楚申诉流程，但是他们对自己在工厂的工作情况比较满意，所以过去12个月没有过申诉。Amfori BSCI行为守则及海报已经张贴在车间，员工可以自由查阅。然而，工厂在实施中仍存在差距。

- 2.4 - It was noted that though the factory posted the BSCI COC publicly, provided BSCI training with all employees, some sampled workers did not have a good understanding of BSCI values and principles. This violated Performance Area 2: Workers Involvement and Protection 2.4.

工厂有提供进行关于社会责任的培训的记录，有张贴BSCI的行为准则，但部分抽样员工并不了解BSCI的价值和原则。根据执行领域2：工人参与度和保护-2.4改善。

- 2.5 - It was noted that the established grievance mechanism was not including all interested parties, only for internal part. This violated Performance Area 2: Workers Involvement and Protection 2.5.

工厂建立的申诉机制没有包含所有利益相关方，只是对工厂内部适用。根据执行领域2：工人参与度和保护-2.5改善。

**Remarks from Auditee:**

None

<b>Performance Area 3 : The rights of Freedom of Association and Collective Bargaining</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility had established formal policy to employees' right of forming, joining and organizing trade unions upon their choice and to bargain collectively with the facility. The facility did not interfere with the establishment, functioning or administration of worker organization or collective bargaining. There was no union or collective bargaining agreement in the facility, two worker representatives were elected by all employees including the production employees fairly and publicly. The facility conducted regular meeting with worker representative to discuss the daily affairs, the meeting minutes were provided for review.</p> <p>工厂建立了尊重员工根据自己意愿建立、加入以及组织工会并与工厂方进行集体谈判的权利。工厂不干扰工人组织的建立、运行或者管理，不干扰集体谈判。工厂没有工会和集体协议，工厂通过员工包括生产员工公平公开地自由选举了2名员工代表。工厂定期与员工代表举行会议讨论日常事务，会议记录有提供查看。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 4 : No Discrimination</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility had established procedure to prevent any kind of discrimination and all management staffs were trained and promised to obey this principle. There was no limit on age, race, gender, marriage status, etc. for recruiting, firing, promoting, training, paying social benefit, etc. Pregnant women workers and worker representatives were also not discriminated. Workers could directly tell senior manager if there was discrimination issue. Through worker interview and site observation, no discrimination happened in the process of working.</p> <p>工厂建立了程序来禁止任何形式的歧视，所有管理人员接受了培训并承诺遵守该原则。工人在招聘、解雇、晋升、培训、提供福利等方面不会因为年龄、种族、性别、婚姻状态等受到限制；怀孕女工和员工代表也不会受到歧视。如果有歧视事件出现，员工可以直接投诉给高级管理层。通过员工访谈和现场走访，工作过程中没有歧视现象出现。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 5 : Fair Remuneration</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:24/05/2020
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The auditee had set up written procedures regarding wages and benefits. The auditee knew the local minimum wage standard (i.e. CNY11.55 per hour) and did not hire any worker for a lower remuneration than the minimum wage. Wage records from February 2019 to January 2020 were provided for review and it was noted that workers were paid at least CNY13.85 per hour. Moreover, the auditee paid workers timely and regularly, at the end of each month. Workers were provided with benefits such as annual leave, sick leave, work-related injury compensation, and etc. No illegal deductions were made from workers' wages. However, gap was noted in social insurance coverage.</p> <p>被审核方已建立关于工资和福利的书面程序。被审核方了解当地最低工资标准（即CNY11.55元/每小时），不以低于最低工资的报酬聘请任何工人。工厂提供了从2019年2月至2020年1月的工资记录供审核，工厂支付工人至少CNY13.85元/每小时。被审核方及时、定期地在每个月月底支付员工工资。工人享有年假、病假、工伤补贴等福利。工人的工资没有存在不合法扣款。但工厂在社会保险覆盖率方面存在缺陷。</p> <p><b>5.5 -</b> According to the social insurance payment receipt provided by factory management, it was noted that only 13 out of 47 (27.65%) employees were provided with pension, medical, unemployment, maternity and accident insurance in February 2020. Factory had provided the rest employees with group accident insurance, which was valid from August 10th, 2019 to August 09th, 2020. In accordance with Article 73 of the Labor Law of the People's Republic of China. According to factory management, they did not provide social insurance to all employees because some employees were unwilling to participate in the social insurance program. All employees interviewed also confirmed that they were voluntarily to participate in the social insurance program.</p> <p>工厂的社会保险覆盖不足。根据厂方提供的2020年2月社会保险缴费单据显示工厂为13/47名(27.65%)员工提供了养老，医疗，失业，生育和工伤保险。工厂为剩下的员工提供了团体意外伤害险，有效期为2019年8月10日至2020年8月9日。根据《中华人民共和国劳动法》第73条。根据工厂管理层访谈，社保覆盖不足是由于部分员工不愿意缴纳社保。根据员工访谈，员工自愿缴纳社保。</p>	
<b>Remarks from Auditee:</b> None	



**Performance Area 6 : Decent Working Hours**

Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: D

Deadline date:24/05/2020

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The auditee had internal procedures with regards to working hours, such as overtime hours and rest days. Working hour records from February 2019 to the current audit day (March 24th, 2020) were provided for review. Workers worked 8 regular hours per day and 40 regular hours in a week. Working hours were recorded through finger printing attendance machine. Overtime was voluntary and paid in a premium rate as defined by the law. Workers were allowed to take short breaks during working hours and meal breaks when work shifts ended. Workers worked from 08:00 to 17:30 with a break from 12:00 to 13:30. Workers worked 2 overtime hours a day at most and were provided with at least one day off in every seven days. However, gaps were noted with regard to workers' monthly overtime hours.

被审核方有关于工作时间（如加班时间、休息日）的内部程序。工厂提供了2019年2月至此次审核当天（2020年3月24日）的工时记录供审核。工人每天工作8小时，每周工作40小时。工人的工作时间通过指纹识别考勤机记录。加班是自愿的，而且以法律规定的加班费支付。工人可在工作时间内有短暂的休息时间，在班次结束后有用餐时间。工人正常工作时间为08:00至17:30，中间12:00至13:30休息。工人每天最多加班2个小时，且每7天至少休息1日。然而，工人每月加班时间存在差距。

**6.2 -** According to the payroll and attendance records of 5 sampled workers each in January 2020, October 2019 and August 2019 and attendance records of 5 sampled workers in February 2020; it was noted that 5 out of 5 sampled workers in October 2019 worked 48 hours overtime work a month, 5 out of 5 sampled workers in August 2019 worked 56 hours overtime work a month, which exceeded the statutory overtime hour limits of 36 hours a month. This violated Article 41 of the Labor Law of the PRC. The Production Manager was appointed to control the overtime hours. Currently, they did not have a plan to reduce monthly overtime hours to meet legal requirement. All employees interviewed represented that they were voluntarily to work overtime and they confirmed that they overtime worked more than 36 hours per month when busy.

根据抽样的2020年1月5名员工，2019年10月5名员工，2019年8月5名员工的工资和考勤记录和最近完整但未发薪月2020年2月5名员工的考勤记录，2019年10月5/5名员工月加班48小时，2019年8月5/5名员工月加班56小时，超过了法定限制的36小时每月。根据《中华人民共和国劳动法》第41条。工厂生产经理负责管控加班时间。目前工厂暂无减少加班时间的计划。访谈员工表示自愿加班，在生产忙时每月加班时间超过36小时。

**Remarks from Auditee:**

None

<b>Performance Area 7 : Occupational Health and Safety</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:24/04/2020
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>Transportation were not provided for workers. The main production processes in the factory were injection, polishing, assembling, paint spraying and packing. The auditee had set up internal procedures on occupational health and safety and conducted risk assessments to identify the most common risks for workers and define the kind of preventive or remedial measures that may be necessary. An occupational health and safety committee was set up by the auditee and OHS committee meetings were kept for review. Workers were trained on OHS including evacuation and fire-fighting drills. The recent two evacuation and fire-fighting drills were conducted in May 2019 and November 2019 respectively. The auditee provided personal protective equipment free of charge to workers. The auditee had written procedures with regards to accident or emergency and had necessary firefighting equipment, emergency exits and first aid kits. Four first aiders, first aid kits and related procedures were available to ensure emergency treatment. The paint spraying workshop was located on the 3rd floor, and employees were trained on handling chemicals. The auditee provided access to potable water and toilets at all times in the workplace. However, gaps were still noted in the performance area.</p> <p>工厂没有为工人提供交通。工厂的主要生产工序是注塑，打磨，组装，喷漆和包装。被审核方建立了职业健康和安全的内部程序，并进行了风险评估以识别出最常见的工人风险和明确必要的预防或改善措施类型。被审核方设立了职业健康与安全委员会并保留了会议记录。工人获得了职业健康与安全培训，其中包括疏散和消防演习。最近两次消防演习分别于2019年5月和2019年11月进行了。被审核方向工人免费提供了个人防护装备。被审核方有关于意外或紧急情况的书面程序，也有必要的消防设备、紧急出口和急救药箱。工厂有4名急救人员、急救药箱和相关的程序来确保紧急救治。喷漆车间单独设置在3楼，工厂都经受培训如何使用化学品。工人在工作场所任意时间均可使用饮水设施和厕所。然而，该执行领域仍存在差距。</p> <p><b>7.3 -</b> It was noted that the risk assessment for safe, healthy and hygienic working conditions was not conducted sufficiently. The risk assessment did not cover all production activities, workplaces, machinery, equipment, chemicals, tools and processes and regular monitoring and testing. This violated Performance Area 7: Occupational Health and Safety 7.3. 工厂为车间岗位进行风险评估不充分。没有涵盖所有生产活动、生产车间、机器、设备、化学品、工具和过程，没有包括定期监控和检测。根据执行领域7：职业健康和安全 7.3改善。</p> <p><b>7.4 -</b> Worker and worker representative were not involved in the risk assessment. This violated Performance Area 7: Occupational Health and Safety 7.4 员工及其代表没有参与风险评估。根据执行领域7：职业健康和安全 7.4改善。</p> <p><b>7.6 -</b> One employee working in the polishing area was wearing disposable mask, instead of anti-dust mask provided by factory. This violated Article 42 of Law of the People's Republic of China on Production Safety PPE was issued to all employees, and employees were provided with training on PPE 审核员发现工厂打磨车间1名员工佩戴的是一次性口罩，而不是工厂提供的防尘口罩。根据《中华人民共和国安全生产法》第42条 工厂给所有员工配备了相应的个人防护设备，且给员工提供了培训</p> <p><b>7.7 -</b> It was noted that there was no anti-leakage facility (e.g. secondary container) for thinner (Hazardous chemical) being used in workshop. In accordance with article 20 of Regulation for Safety of Hazardous Chemical MSDS was posted, and relevant employees were provided with chemical training. 审核员发现工厂没有为车间正在使用的稀释剂(危险化学品)设置防渗漏设施/二次容器。根据《危险化学品安全管理条例》第20条 现场有张贴MSDS, 且相关员工都接受了化学品培训。</p> <p><b>7.13 -</b> It was noted that the electric circuit in one electric switch in the canteen was exposed without insulation protective device. In accordance with Article 5.1.2 of the General Guide for Safety of Electric User (GB/T13869-2017) The electrician was responsible for the electric safety in the factory, and regular inspection was conducted. 审核员发现工厂食堂区1个开关内的电线裸露，没有足够的保护装置。根据《用电安全导则GB/T13869-2017》第5.1.2条 工厂电工专门负责工厂电器安全，且会定期检查。</p> <p><b>7.17 -</b> It was noted that the transmission belt of 1 drilling machine was not equipped with pulley guard. In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene Regular inspection of machine safety was conducted, employees were provided with machine safety training. Per employee interview, no accident had happened. 审核员发现工厂1台台钻没有为外露的皮带轮安装保护罩。根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条。工厂每月对机器进行安全检查，也给员工提供了机器安全的培训。根据员工访谈，工厂暂没有发生过工伤。</p> <p><b>7.23 -</b> Remark: No transportation was provided.</p>	
<b>Remarks from Auditee:</b> None	
<b>Performance Area 8 : No Child Labour</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility had established hiring procedure regarding prohibition use of child labor, meanwhile, the facility had also established remediation procedure on child labor in order to set up measures for recruiting child labor incidentally. The facility would verify all employees' original ID cards at the time of recruitment and kept the photocopies of employees' ID cards in the personnel files. No child labor was detected or reported in current audit.</p> <p>被审核方部分遵守本执行领域要求。工厂建立了禁止使用童工的招聘制度，同时工厂还制定了童工补救措施以建立意外招聘童工的应对措施。工厂在招聘员工时会核查员工的身份证原件并保留其复印件在员工档案里。此次审核未发现或者汇报有童工。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 9 : Special protection for young workers</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The factory had established a written policy concerning protection of juvenile employees such as no overtime work, night shift work or harmful position work would be arranged for juvenile employees, and juvenile employees would be provided with free health check. Through document review, factory tour and employee interview, no juvenile employee was used in the factory. The youngest employee in the factory was 19 years old. 工厂建立了未成年工保护政策，比如不能安排未成年工加班、上夜班或在有毒有害岗位工作，并且给未成年工提供免费体检。通过文件审核、现场走访和员工访谈，工厂没有使用未成年工。工厂最小的员工是19岁。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 10 : No Precarious Employment</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The facility signed labor contracts with all employees on the on-boarding day immediately and provided a copy version to them. The labor contracts were in local language (Chinese) and all employees could understand it. Necessary clauses such as working position, working shift, wage payment, social insurance etc. were included in the labor contracts. Moreover, occupational hazard factors notification was reflected in labor contracts for workers working on related positions, including injection, polishing, paint spraying, and etc. All the employees were directly hired by the facility, no dispatched worker, student worker and apprentice were hired. 工厂在员工入职当天和员工订立了劳动合同并且给员工提供了员工合同副本。劳动合同是当地语言（中文）的，所有员工都能看懂。合同里包含了工作岗位，工作时间，工资发放，社会保险等基本的条款，并且职业病危害因素告知书也有在相关岗位工作的员工的劳动合同中体现，包括注塑，抛光和喷漆等。所有员工都是工厂直接聘用的，工厂没有用到劳务派遣工，学生工，学徒工等。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> Written procedure related to prohibition of forced labour was established in the facility and communicated with all the management and the workers. Based on site observation, management interview and worker interview, no prison labors were used by the facility, workers conducted overtime work voluntarily, they could leave the facility freely after shift ended, and terminate the employment relationship after the leave application being submitted one month in advance. No any forms of physical harassment or verbal abuse performed by the supervisors or management were detected or reported in the audit. 工厂制定了禁止强迫劳动相关的书面程序，并将此程序传达给所有的管理层以及员工。基于现场观察、管理层访谈以及员工访谈，工厂没有使用监狱工，员工自愿加班，在工作结束后他们可以自行离厂，在提前一个月提交辞职申请后可以终止雇佣关系。此次审核未发现或有汇报管理层和主管们有过任何形式的肢体骚扰以及言语虐待。	
<b>Remarks from Auditee:</b>	

<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: B	Deadline date:24/05/2020
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The auditee had policies and procedures to incorporate relevant environmental laws and assessed the impacts of its production operations to prevent or minimise harming the surrounding communities, resources and environment. The auditee had procedures in place to identify and separate the type of waste generated and define specific handling requirement. No waste was found being dumped into natural environment or burned in open fires during the audit. However, hazardous waste in factory was not properly handled.</p> <p>被审核方建立了政策和程序来结合相关环境法规，并评估了其生产活动的影响，以防或尽量减少对周围社区、资源和环境的伤害。被审核方有程序来识别和区分产生的废弃物类型和明确特定的处理要求。审核中未发现工厂向自然环境倾倒废弃物或明火焚烧废弃物。但工厂未合理处置危险废弃物。</p> <p><b>12.4 -</b> It was noted that the paint slag (HW12) and waste activate carbon (HW49) were generated in the factory. However, the factory management was unable to provide the hazardous waste entrust disposal contract and relevant transfer manifest of these hazardous wastes for review. In accordance with Article 57 of Law of the People's Republic of China on Prevention and Control of Solid Waste Pollution                      审核员发现工厂有漆渣(HW12)，废活性炭(HW49)产生,但工厂不能提供相关的合法处置文件(与有资质回收商的合同与危废转移联单)。根据《中华人民共和国固体废物污染环境防治法》第57条</p>	
<b>Remarks from Auditee:</b> None	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - 176065] Audit Date: 24/03/2020 PA Score: A	Deadline date:24/04/2020
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The auditee partially respects the requirement of this performance area. The auditee had established written ethic policy and none of any act of corruption, or any form of bribery in its activity was noticed during this audit. The auditee kept accurate information regarding its own activities, structure and performance during this audit. Auditor reviewed the payrolls and attendance records provided by main auditee, cross checked these records with other records such as warehouse records, and interviewed workers, no inconsistency was identified.</p> <p>被审核方部分遵守本执行领域要求。被审核方制定了书面的廉政政策并且在审核过程中并没有发现任何腐败或贿赂的商业行为。此次审核中被审核方保留了有关其商业活动、架构和绩效的准确信息。审核员审核了工资表和考勤记录，交叉检查了其它一些记录，如仓库进出库记录，和员工进行了访谈，没有发现不一致。</p> <p><b>13.4 -</b> Although factory had establish privacy and information security policy, management and employees had little knowledge about it. This violated Performance Area 13: Ethical Business Behavior 13.4.                      工厂虽然建立了信息安全程序，但管理层和员工都不知悉。根据执行领域13：道德的商业行为13.4.</p>	
<b>Remarks from Auditee:</b> None	

**Summary**



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	24/03/2020	176065	B	B	A	A	A	D	A	A	A	A	A	B	A	C

**Producer Photos**



External photo(s) of the production unit(s)  
Assembling area.JPG



External photo(s) of the production unit(s)  
Factory entrance.JPG



External photo(s) of the production unit(s)  
Packing area.JPG



External photo(s) of the production unit(s)  
Attendance recording machine.JPG



External photo(s) of the production unit(s)  
Factory name.JPG



External photo(s) of the production unit(s)  
Paint spraying area.JPG



External photo(s) of the production unit(s)  
Canteen interior.JPG



External photo(s) of the production unit(s)  
Fire extinguishers.JPG



External photo(s) of the production unit(s)  
Polishing area.JPG



External photo(s) of the production unit(s)  
Chemical warehouse.JPG



External photo(s) of the production unit(s)  
Fire hydrant box.JPG



External photo(s) of the production unit(s)  
Production building.JPG



External photo(s) of the production unit(s)  
COC posted.JPG



External photo(s) of the production unit(s)  
Injection area.JPG



External photo(s) of the production unit(s)  
Safety shoes.JPG



External photo(s) of the production unit(s)  
Dormitory interior.JPG



External photo(s) of the production unit(s)  
NC 7.13 Missing insulation device for electric switch.JPG



External photo(s) of the production unit(s)  
Suggestion box.JPG



External photo(s) of the production unit(s)  
Drinking water.JPG



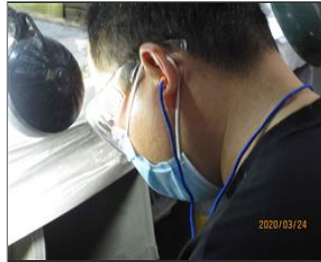
External photo(s) of the production unit(s)  
NC 7.17 Missing pulley guard for transmission belt.JPG



External photo(s) of the production unit(s)  
Testing of emergency light.JPG



External photo(s) of the production unit(s)  
Evacuation plan.JPG



External photo(s) of the production unit(s)  
NC 7.6 Plishing employee wearing disposable mask.JPG



External photo(s) of the production unit(s)  
Testing of fire alarm.JPG



External photo(s) of the production unit(s)  
Exit sign and emergency light and fire alarm.JPG



External photo(s) of the production unit(s)  
NC 7.7 No secondary container for hazardous chemicals.JPG



External photo(s) of the production unit(s)  
Testing of fire hydrant.JPG



External photo(s) of the production unit(s)  
Eye washing facility.JPG



External photo(s) of the production unit(s)  
Occupation hazard warning.JPG



External photo(s) of the production unit(s)  
Toilet.JPG



External photo(s) of the production unit(s)  
Factory address.JPG



External photo(s) of the production unit(s)  
Office and canteen and dormitory building.JPG