

Sedex Members Ethical Trade Audit Report

Version 7



Contents

[Audit content](#)

[Audit and site details](#)

[Audit parameters](#)

[Audit attendance](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[0. Enabling accurate assessment](#)

[1. Employment is freely chosen](#)

[1.A. Responsible recruitment and entitlement to work](#)

[2. Freedom of association and right to collective bargaining are respected](#)

[3. Working conditions are safe and hygienic](#)

[4. Child labour shall not be used](#)

[5. Legal wages are paid](#)

[5.A. Living wages are paid](#)

[6. Working hours are not excessive](#)

[7. No discrimination is practiced](#)

[8. Regular employment is provided](#)

[8.A. Sub-contracting and homeworkers are used responsibly](#)

[9. No harsh or inhumane treatment is allowed](#)

[10.A. Environment 2-Pillar](#)

[10.B. Environment 4-Pillar](#)

[10.C. Business ethics](#)

[Attachments](#)

Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC5000058511	Auditor company name	Benchmarks Company Limited
Date of audit	2025-04-07	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS1000069297	Site name	Ning Bo Yiheng Art & Craft Co Ltd
Business name	Ning Bo Yiheng Art & Craft Co Ltd	Site address	315500 No.701, B2 Building, WanYang Zhongchuang Cheng, Binhai, Chunhu Street, Fenghua District,Ningbo,Zhejiang, NINGBO, CN
Site phone	08615888547991	Site email	439273989@qq.com

Audit parameters

Time in and out	Day 1		Day 2	
	In	09:10	In	08:20
	Out	17:30	Out	12:30
Audit type	Full initial			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Mrs.Deng ting / General Manager			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no union at this factory.		
Reason for absence during the audit	There was no union at this factory.		
Reason for absence at the closing meeting	There was no union at this factory.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

The semi-announced window of this audit is from April 1st to April 30th, 2025

Lead auditor

Eric Yang

APSCA Number

32200496

Additional auditor

Date of declaration

2025-04-08

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Mrs.Deng ting
Title	General Manager
Date of declaration	2025-04-08





































Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC ZAF600890745
	3.R Provide clean and secure toilets, wash ar...	§2	NC ZAF600890746
	3.R Provide clean and secure toilets, wash ar...		NC ZAF600890747
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§3	NC ZAF600890748
7. No discrimination is practiced	7.E Have a dedicated equity approach in recru...		NC ZAF600890749

Local law issues

§1	Regulations on the Control over Safety of Dangerous Chemicals, Article 20 The units producing, storing dangerous chemicals shall, according to the categories and hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipment for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, firefighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moisture-proof, protection against thunder, protection against static, antiseptic, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipment.
§2	In accordance with the Rules for Warehouse Fire Prevention Safety Management Article 18. the goods in the warehouse should be classified for storage. The area occupied by any single stack should not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.
§3	Labor Law of the People's Republic of China, Article 72, The sources of social insurance funds shall be determined according to the branches of insurance, and an overall raising of social insurance funds shall be practised step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, laborers shall, under the following circumstances, enjoy social insurance benefits in accordance with the law: (1) Being retired; (2) Being ill or injured; (3) Being injured or disabled while on duty or contracted with occupational diseases; (4) Being unemployed; or (5) Childbirth.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	ⓘ	ⓘ
9. No harsh or inhumane treatment is allowed	✔	✔	ⓘ	ⓘ
10.A. Environment 2-Pillar	✔	ⓘ	ⓘ	ⓘ
10.C. Business ethics	✔	✔	✔	✔

- ✘ Not addressed
- ⚠ Fundamental improvements required
- ⓘ Some improvements recommended
- ✔ Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000058511	
Sedex site reference	ZS1000069297	
Company name	Ning Bo Yiheng Art & Craft Co Ltd	
Business ownership type	GOODS	
Site name	Ning Bo Yiheng Art & Craft Co Ltd	
Site name in local language	宁波怡恒工艺品有限公司	
GPS location	GPS address	Room 702, Building B2, Binhai Wanyang Zhongchuang Park, Chun Hu Street, Fenghua District, Ningbo City, Zhejiang Province, China.
	Coordinates	Latitude: N 29°52'74". Longitude: E 121°48'20"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mrs.Deng ting
	Job title	General Manager
	Phone number	08615888547991
	Email	439273989@qq.com
Applicable business and other legally required business license numbers and documents	Business licence No.: 91330283MAD3M6X42X. Valid from October 17, 2023 to long term.	

Site activities

Site function	Finished Product Supplier
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Site activities

Site activities	Primary	Manufacture of games and toys
	Secondary	
	Other	
Product type	The main product is colourful eggs.	
Process overview	The main products is colourful eggs.. The main operations included: painting – drying – sterilization- Assambling -Inspection and Packing, The main equipment used in factory were list as below: 2 Spray gun, 1 drying machines,etc.	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	3000m ²

Site scope

Building 1	Last construction works on site	2023
	If building is shared, provide details	The facility rented the seventh floor of one 7-storey building(B2) from landlord named Ningbo Fenghua Wangyang Zhongchuang Park Development Co., Ltd. as workshop, office and warehouse, the rest areas of this buildings were used by other facilities, no dormitory, canteen and canteen were available for employees in the facility. The building was reinforced concrete building. From visual observation, the building was observed in safety conditions and without cracks.
	Number of floors	7
	Description of floor activities	1F:Used as workshop and warehouse by Ningbo Dongpei Machinery Manufacturing Co., Ltd. 2F:Used as workshop and warehouse by Ningbo Haodisen Garment Accessories Co.,Ltd. 3F:Used as workshop and warehouse by Ningbo Gaodu Garment Co., Ltd. 4F:Empty 5F:Empty 6F:Used as workshop and warehouse by Ningbo Yachen Electric Appliance Co.,Ltd. 7F:Used as workshop, warehouse and offices area by auditee.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No	
Does the site organise worker transport to the worksite?	Not provided	There is no legal requirement. The factory did not provide transport to employees.

Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	90-95%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night or back shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No
The site has not assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
No legal requirement for this and there had not been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	10 (50%)	10 (50%)	- -	20 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	10 (50%)	10 (50%)	- -	20 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	9 (50%)	9 (50%)	- -	18 (90%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	9 (50%)	9 (50%)	- -	18 (90%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Sichuan,Yunnan,Henan province.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 -	0 -	- -	0 (0%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	The peak season was not obvious.
Please list the nationalities of all workers, with the three most common nationalities listed first	Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	50%	50%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	10 (50%)	10 (50%)	- -	20 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	10 (50%)	10 (50%)	- -	20 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details NA

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	0 (0%)	1 (100%)	- -	1
Supervisors or team leaders	0 -	0 -	- -	0
Administrative staff	0 (0%)	1 (100%)	- -	1

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Group interviews Individual interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 1 group of 5 workers.

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions? No

What was the general attitude of the workers towards their workplace? Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No complaints were raised by workers. Nearly all interviewed workers seemed to be satisfied with the working condition. All interviewed workers had a positive attitude towards the factory and management.
What did the workers like the most about working at this site?	Communication (e.g. from management) Pay Work atmosphere (e.g. treatment by supervisors)
Additional comments	Workers stated that they felt satisfied with the current working situation. Last year in 2024, orders declined and production was not busy. They hope to have more orders in 2025. No negative information.
Attitude of workers' committee/union representatives	The employee representative expressed that the factory management is very friendly, treats employees very humanely, communicates smoothly with them, and listens to their opinions and suggestions. Employees generally believe that the working environment and treatment in the factory are good, and workers are willing to work in the factory for a long time. No negative information.
Attitude of managers	Through interviews and communication with the management, it was found that they attach great importance to employee relations. By creating a good working environment, reasonable salary and physical benefits, and harmonious employee relations, they hope that workers can provide long-term stable services in the factory. Willing to adopt and implement reasonable opinions and suggestions put forward by employees. The management is quite cooperative with the labor audit and has stated that they will improve their management level through continuous improvement. No negative information.

Workers interviewed by type

	Total
Permanent workers	11
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	11

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	3	3	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	5	5	-	10
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	5	5	-	10

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	2.0%	-	3.0%
Last full calendar year (2024)	1.0%	2.0%	-	3.0%
Previous full calendar year (2023)	1.0%	2.0%	-	3.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.01%	0.01%	-	0.02%
Previous full calendar year (2023)	0.01%	0.01%	-	0.02%

* Number of days lost through job absence in the year, calculated as (the 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*100

Are accidents recorded?

Yes

The written accident records indicated that no accident had ever occurred.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1.This audit was conducted by one auditor on a sampling basis in 1.5 days.</p> <p>2.At 09:10 on the first day, auditor entered the factory then held an opening meeting, the factory managements and worker representative were present in the opening meeting. They stated that they would be cooperative with this audit.</p> <p>3.The factory set up a policy which was published by the manager, covering human rights impacts and issues, and it was communicated to all appropriate parties, including its own suppliers.</p> <p>4.The factory allowed and supported the auditor to carry out and complete the audit without hindrance to all requested documents, interviewees and the factory itself.</p> <p>5.The factory had a designate person responsible for implementing standards concerning Human rights.</p> <p>6.The factory set up a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter by means of suggestion box, making the contact way of General Manager and Manager in bulletin board and public areas in the factory, and the factory protected the reported never disclosing any individual information about the reporter to any individuals.</p> <p>Details:</p> <p>1.Human rights statement documents</p> <p>2.Employee handbook</p> <p>3.Management interview and worker interview</p> <p>4.Social responsibility policy, procedure and work instructions</p> <p>5.Internal audits records</p> <p>6.Suppliers management procedure</p> <p>7.Business license</p>		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes The site provided the following documents of the workers who were employed directly for review: wage/benefit and working hour records, personal files including age documents, contracts/agreements and work permits, training records, and other HR related documents.

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The factory established a non-formalized application procedure. The procedures stipulated that workers present their IDs for proof their age. In additional, only copies should be kept in the personnel files and the original would be given back to the workers and worker was free to leave the workplace outside of their working hours. The procedures were compiled by the Admin department, reviewed by the admin Manager, and approved by the General Manager.</p> <p>The role(s) responsible for "Employment is freely chosen" has the necessary skills and has the seniority to manage Workplace Requirements. Facility established systems to ensure the management structure and responsibilities are reactive to changing circumstances. Management structure was effectiveness to achieve compliance sustainably over time. The manager received relevant social responsibility training, which included content on the prohibition of forced labor. They used this knowledge to develop effective procedural documents and to conduct training for factory workers.</p> <p>The factory conducted an overall evaluation of the training effectiveness of the previous year's training and regularly conduct training needs analysis to develop annual training plans to adapt to changes in operating conditions.</p> <p>Facility had effective monitors procedures, taking actions where results require it or changes to policies and processes are made. Monitoring ensured sufficient management of the Workplace Requirements in "Employment is freely chosen" on an ongoing basis. Evidence of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Responsibilities for monitoring and targets were defined and utilised.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

- 1.The factory had a policy which prohibited forced labor and this was available for review.
- 2.Through document review and worker interviews, it was confirmed that there was no forced, bonded or involuntary prison labour.
- 3.Workers were not required to lodge "deposits" or their identity papers with their employer.
- 4.The factory did not make a body search.
- 5.There was a procedure stated that employees must present their ID cards for proof of age, and only copies should be kept in the personnel files and the original given back to workers.
- 6.The terms and conditions of employment in the handbook stated that the employees were free to leave the workplace outside of their working hours.
- 7.The employees obtained their jobs by themselves or by friend's recommendation.
- 8.According to the Internal Company Regulations and the reviewed labour contracts the workers could resign within 30 days' notice period, which was allowed by law.

Details:

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

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>Handbook. The management system was strengthened by specific policies and processes, including the implementation of controls for compliance with the requirements of the workplace. The factory retained records necessary to demonstrate that all workers had the legal right to work.</p> <p>The role(s) responsible for "Responsible recruitment and entitlement to work" has the necessary skills and has the seniority to manage Workplace Requirements. Facility established systems to ensure the management structure and responsibilities are reactive to changing circumstances. Management structure was effectiveness to achieve compliance sustainably over time.</p> <p>Training was conducted according to a documented plan and one or more of the criteria are applicable. Facility provided training on its policies to its employees regularly. However, they did not check if all employees understood the policies. Through employee interviews, it was found that some employees have forgotten the relevant training content.</p> <p>The manager followed and monitored the execution of the procedures, ensuring there were no cases where employees were required to pay additional fees. However, through interviews with management and document review, Partial monitoring records are incomplete.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

1. Per documents review, factory management interviews and worker interviews, all employees in the factory were Chinese, no migrant employees from other country.
2. All employees had the proper legal rights to work in this region.
3. The youngest employee found within the sample was 26 years old. All of them were recruited directly by the facility.
4. No agency was used in facility's for recruitment process. Workers were hired without any recruitment fees or related costs.

Details:

1. Recruitment Policy and Procedures.
2. Duties and responsibilities of the Plant Head and Accounts/HR Executive.
3. Personal files.
4. Internal Regulations

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	90%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Sichuan,Yunnan,Henan province.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
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Were recruitment fees or costs identified during worker interviews?	No
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No recruitment fees or costs were identified during worker interviews.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The facility's policy to "Respect workers' freedom of association and right to collective bargaining" outlined the systems in place to manage this issue at the site, including all relevant requirements of the code area.</p> <p>The factory appointed the administrative manager to assist workers in electing worker representatives, regularly communicate with worker representatives, follow up on worker representative meetings, and report to the factory management. The admin manager has rich experience in employee communication and management. The admin department held quarterly meetings with worker representatives to discuss and follow up on the decisions made during the meeting.</p> <p>New employees were required to attend on-boarding training from the admin department which included employee representative election procedure and employee freedom of association procedure. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone, including employee representative election procedure and employee freedom of association procedure. But they did not check if all employees understood the policies.</p> <p>Admin manager strictly followed and monitored the execution of the procedure, and workers were free to elect worker representatives, who could hold meetings and communicate with workers as necessary. However, The collection records of the employee feedback box show that the monthly employee feedback is "no problem". Suggest improving the effectiveness of collecting information in the suggestion box.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

Systems and evidence examined to validate this code section

1. The Chinese constitution guaranteed Freedom of Association; however, the Trade Union Act prevented the establishment of trade unions independent of the sole official trade union – the All-China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China were under the management of ACFTU. And most of the trade union representatives were appointed directly by it. Additionally, the trade union activity was limited on the right to organize and bargain collectively in China.
2. The written policy on freedom of association showed that workers, without distinction, had the right to join or form trade unions of their own choosing and to bargain collectively.
3. The election of worker representative was conducted regularly, two worker representatives were responsible for all employees' suggestion collecting and reporting.
4. No union was available in the factory.
5. The factory had policy and procedure on the responsibilities of worker representatives.
6. Worker representatives were not discriminated against and could carry out their representative functions in the workplace.
7. Worker interview confirmed that the members of the worker committee were elected by fellow workers, and they understood the role and responsibilities of committee members fully.
8. The employer adopted an open attitude towards the activities of trade unions and their organizational activities.
9. The factory had a mechanism that employees could raise their grievances directly to supervisors, worker representative, or put letters in to state their opinions and suggestions, and then the management would post corresponding feedback on the bulletin board.
10. The suggestion box was opened once a month and the factory provided the records for reviewing.

Details:

1. Interview with workers, managers and worker representative
2. Meeting records between factory management and worker representatives
3. The policy on freedom of association
4. Social accountability manual included worker committee selection program and the responsibility of the worker representative.
5. Workers committee election records of worker representatives.

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	No
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The facility's policy to "Provide safe and hygienic working and living conditions to ensure the health and safety of employees" outlined the systems in place to manage this issue at the site, including all relevant requirements of the code area. However, the operation SOP posted near the process focuses on quality content, lacks safety and environmental content.</p> <p>The role(s) responsible for "Working conditions are safe and hygienic" has the necessary skills and has the seniority to manage Workplace Requirements. Facility established systems to ensure the management structure and responsibilities are reactive to changing circumstances. However, the personnel responsible for safety management needs to perform other tasks such as administrative management, and there are no full-time safety management personnel.</p> <p>Effective training and communication of policy and procedures were provided to all relevant workers, including managers and supervisors. Training was conducted according to a documented plan/ procedure, which included assessment and refresher training. Training content was updated according to need and the procedure for this is documented. However facility did not conduct effective assessment of understanding of those receiving training to ensure the effectiveness of training.</p> <p>The factory regularly conducted internal audits of the workplace and implemented corrective and preventive measures. The Admin manager also supervised and inspected the factory's health and safety on a daily basis. However, daily workshop safety inspections were not effectively carried out, and onsite execution issues were not proactively identified and closed. It is recommended that enterprises strictly implement daily workshop safety inspections.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
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3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC	ZAF600890745
	3.R Provide clean and secure toilets, wash ar...	§2	NC	ZAF600890746
	3.R Provide clean and secure toilets, wash ar...		NC	ZAF600890747

Systems and evidence examined to validate this code section

- 3.1. General Health and Safety management
 1. The factory had a policy and procedure on Health & Safety, and the factory managers were familiar with it. And these policies and procedures were communicated to the workforce through workers manual.
 2. The factory conducted H&S meeting regularly.
 3. PPE provided by the factory for employees, such as Activated carbon mask, glove.
 4. The health and safety training were conducted. The factory provided training records.
 5. Lavatory facilities were adequate in number, segregated by gender.
 6. Potable water was provided free of charge to workers.
 7. Based on the observation on site, production buildings were clean and tidy, no cracks or other abnormality in the walls of the buildings was observable.
 8. Ventilation, temperature and lighting were adequate for the production processes.
- 3.2. Fire Safety.
 1. The factory had obtained the building structure safety records and fire safety certificates for the building.
 2. The factory was equipped with fire protection facilities and apparatuses under the national standards and industrial standards, set up fire safety signs, and conduct monthly testing and maintenance so as to ensure that they were in good condition and effective.
 3. There were at least 2 exits from each work area and these were clearly marked. The exit was clear and unblocked.
 4. Fire-fighting facilities were inspected once every month, and check records were available.
 5. The factory had a relevant fire evacuation plan in workshop.
 6. The factory conducted fire drills and emergency evacuation exercise twice per year. Provided exercise photos and employee attendance records.
 7. All evacuation aisles were clear and unblocked and its width was enough.
- 3.3. Electrical safety
 1. Most of the electrical appliances were maintained in good condition such as sockets, plugs, switches and main fuse boards.
 2. The factory hired an electrician. And copy of the qualified certificate was provided for review.
 3. The factory provided monthly inspection records of electrical appliances.
- 3.4. Equipment safety
 1. All of equipment was in good condition, and the workers had been trained in the proper use of equipment.
 2. No accident or injury had occurred up to the audit date.
 3. Accident records were kept and provided for review.
- 3.5. Medical services
 1. The first aid kits were equipped in each floor workshop.
 2. qualified first aiders were available in the factory.
- 3.6. Chemical safety
 1. Based on onsite observation, chemical such as glue was used in assembly workshop.
 2. Through site tour, it was found that the MSDS (Material Safety Data Sheet) were available for the chemicals used and stored area at the facility.

Details:

1. Health and safety policy and manual
2. Health and safety committee minutes
3. Training records and certificates
4. Fire equipment maintenance records
5. First aider certificates
6. Fire drill and evacuation records
7. Building structure safety certificates
8. Fire safety certificates
9. Checks on fire equipment
10. Elevator Annual Inspection Report
11. Electrician certificate
12. Chemical list and MSDS
13. Potable water testing report
14. Site tour
15. H&S manager and committee members interviews

Findings: non-compliances

ZAF600890745

Non-compliance

Due 2025-05-18

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

The safety facilities for storing hazardous chemicals do not meet the requirements. During the on-site inspection, the auditor found that water-based paint was stored and used in the coloring workshop. The storage area for water-based coatings uses secondary containers, but the two barrels of water-based coatings currently in use in the production area are not equipped with secondary containers. 危险化学品储存的安全设施不符合要求。在现场巡查时，审核员发现在上色车间存放和使用的水性涂料。水性涂料储存区使用了二次容器，但生产区正在使用的2桶水性涂料未配备二次容器。

Corrective and preventative actions

It is recommended that the facility should set up the corresponding safety facilities and equipments in workshop or warehouse for hazardous chemicals as per legal requirement. 建议企业应当按照法律规定在危险化学品生产车间或者仓库内设置相应的安全设施和设备。

Local law reference

Regulations on the Control over Safety of Dangerous Chemicals, Article 20 The units producing, storing dangerous chemicals shall, according to the categories and hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipment for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, firefighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moisture-proof, protection against thunder, protection against static, antiseptis, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipment.

Evidence



NC Insufficient secondary container.jpg

* PDF generated at 03:48 (UTC) on 18 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600890746		Non-compliance	Due 2025-06-17
Code area 3 Working conditions are safe and hygienic		Status Open*	
Workplace requirement 3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.		Time given to resolve 60 days	
Issue title 327 - Storage of goods not in line with legal requirements (e.g. too high)		Verification method Desktop audit	
Description After on-site observation, it was found that some packaging materials and products were stacked against the wall in the production and warehouse areas. 经现场观察，发现生产和仓库区域，部分包材和产品靠墙堆放。		Area of non-compliance/non-conformance Local law Base code	
Corrective and preventative actions It is recommended that the facility should ensure all materials and products were properly stored in warehouse to leave proper distance from the wall and pillar. 建议企业存放的物料和货物与墙和柱之间保持合适的距离。			
Local law reference In accordance with the Rules for Warehouse Fire Prevention Safety Management Article 18,the goods in the warehouse should be classified for storage. The area occupied by any single stack should not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.			
Evidence			



[NC product stake against wall.jpg](#)



[NC cardboard stake against wall.jpg](#)

* PDF generated at 03:48 (UTC) on 18 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600890747

Non-compliance

Due 2025-05-18

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Time given to resolve

30 days

Issue title

329 - Sanitary facilities (e.g. toilets, hand basins) are unhygienic/not clean

Verification method

Desktop audit

Description

After on-site observation, it was found that the employee restroom was equipped with hand sanitizer and soap, but not toilet paper. 经现场观察，发现员工厕所内配备了洗手液和肥皂，但没有配备卫生纸。

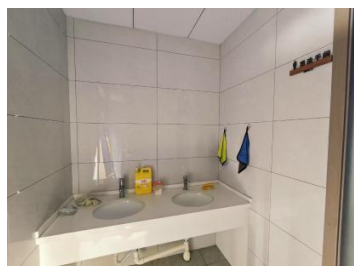
Area of non-compliance/non-conformance

Base code

Corrective and preventative actions

It is recommended that companies refer to ETI requirements and equip employee toilets with toilet paper. 建议企业参考ETI要求，为员工厕所配备卫生纸。

Evidence



[NC no toilet paper-2.jpg](#)

[NC no toilet paper-1.jpg](#)



* PDF generated at 03:48 (UTC) on 18 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	Yes
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Factory workers were exposed to chemicals during working. The factory provided training on chemicals and personal protective equipment to them and PPE was also provided free of charge for workers to use.
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable There was no structural addition in the factory.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The factory established a policy prohibiting child labor and the age of all job applicants must be strictly verified. The procedures stipulated that the factory prohibits the use of child labor and the age of applicant will be strictly verified. The procedures were compiled by the admin department, reviewed by the admin manager, and approved by the General Manager.</p> <p>The factory appointed the administrative manager as the main person in charge of preventing child labor procedures. Regularly communicate with worker representatives, follow up on worker representative meetings, and report to the factory management. The admin manager had been working in the factory for many years and has a good understanding of the policy content and the situation of the factory.</p> <p>New employees were required to attend on-boarding training from the Management which included prohibiting child labor and age of applicants verification. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone.</p> <p>Before employees are hired, the factory conducts a detailed review of their basic information to avoid recruiting child labor. Afterward, the factory regularly verifies employee information. Additionally, the factory has established measures for remedying child labor situations to ensure that appropriate remedial actions can be taken promptly in case child labor is found within the factory.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

1. The factory had established the recruitment procedure on prohibiting child labour and communicated to workers and wrote into the employee handbook.
2. Based on documents review and workers interview, there was no child labour in the factory.
3. The youngest worker on site was currently 26 years old who was born on Feb 14, 1999, and entered in the factory on April 09 2024.
4. All employees should be only hired by the HR department of the factory but not by any other department.
5. Based on the management review, employees' ID and photo should be checked at the point of recruitment. The employee without valid ID certificate should not be hired.
6. Remark: In China, minimum age of worker was 16 years old. Workers between 16-18 were regarded as young labour.

Details:

1. The recruitment policy
2. Interview with management and workers
3. Site tour
4. Recruitment procedure
5. Latest employee list
6. Personnel files of all workers

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	26
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory established a policy about the wages requirement of workers. The procedures stipulated that the factory should pay employees' wages (including overtime) correctly according to local requirements and the wages should above local minimum wage standard. The procedures were compiled by the Management, and approved by the General Manager.</p> <p>The role(s) responsible for " Legal wages are paid " has the necessary skills and has the seniority to manage Workplace Requirements. Facility established systems to ensure the management structure and responsibilities are reactive to changing circumstances. Management structure was effectiveness to achieve compliance sustainably over time.</p> <p>New employees were required to attend on-boarding training from the Management which included how to calculate the wages and so on. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone if some clause was updated. Some employees have informed that the number of training sessions at the factory is limited, and sometimes if they happen to take leave and are not at the factory, they will miss relevant training. Moreover, the factory will not arrange separate training for a small number of people.</p> <p>The manager monitored the workers and required them to follow the relevant requirements. However, the factory not paying enough attention to the issue of employee social assurance and not taking proactive measures to improve.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600890748

Systems and evidence examined to validate this code section

1. The factory had established policy and procedure on wages and benefits, and it was legal and acceptable.
2. The factory kept and provided payrolls from March 2024 to February 2025 for review during the audit. Workers were paid by hourly-rated, and the local minimum wage standard was set at RMB 2490 per month equivalent to RMB 14.31 per hour since January 1, 2024.
3. Based on payrolls review, the overtime wages of workers were guaranteed.
4. The wages were paid by cash on 25th of next month.
5. Based on factory rules review, if the factory rules were broken, relevant workers would be warned and trained.
6. Paid annual leave, marriage & funeral leave, maternity leave and other legal benefits were provided for workers.
7. Based on workers and management interview, the factory provided detailed pay slips to all workers when they received wages.

Details:

1. Wages and benefits policy and procedure
2. Local and national laws
3. Local legal min wage documents
4. Payroll records from March 2024 to February 2025
5. Attendance records from 01 March 2024 to audit day
6. Labour contracts for all workers
7. Resignation records
8. Production records
9. Social insurance payment receipts
10. Worker interview and management interview

Findings: non-compliances

ZAF600890748

Non-compliance

Due 2025-06-17

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

Insufficient participation in social security. Through document review, it was noted that not all employees have participated in all five types of social insurance. The factory has a total of 22 employees, one of whom has reached retirement age and there are no new employees. Therefore, the factory should provide 5 types of insurance for 21 employees. According to the insurance certificates in January and February 2025, the factory only purchased basic pension insurance, basic medical insurance, work-related injury insurance, unemployment insurance, and maternity insurance for 18 employees (86%). 参加的社会保不足。通过文件审查，注意到并非所有雇员都参加了所有5种类型的社会保险。工厂共有22名员工，其中1人已达到退休年龄，没有新员工，因此工厂应为21名员工提供5种保险，根据2025年1月和2月的参保证明，工厂只为18名员工购买了基本养老保险、基本医疗保险、工伤保险、失业保险、生育保险（86%）。

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended that the factory should ensure that 5 kinds of social insurance is paid to all employees as required by regulation. 建议工厂按法规要求提供社保给所有工人。

Local law reference

Labor Law of the People's Republic of China, Article 72, The sources of social insurance funds shall be determined according to the branches of insurance, and an overall raising of social insurance funds shall be practised step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, laborers shall, under the following circumstances, enjoy social insurance benefits in accordance with the law: (1) Being retired; (2) Being ill or injured; (3) Being injured or disabled while on duty or contracted with occupational diseases; (4) Being unemployed; or (5) Childbirth.

Evidence

社会保险费缴费申报表(适用单位缴费人)

缴费人: 东莞市... 所属期: 2025年01月

序号	姓名	身份证号	缴费基数	养老保险	医疗保险	失业保险	工伤保险	生育保险
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

社会保险费缴费申报表(适用单位缴费人)

缴费人: 东莞市... 所属期: 2025年01月

序号	姓名	身份证号	缴费基数	养老保险	医疗保险	失业保险	工伤保险	生育保险
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18

[NC Insufficient social insurance participated 2025.02.jpg](#)

[NC Insufficient social insurance participated 2025.01.jpg](#)

* PDF generated at 03:48 (UTC) on 18 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) Paid by cash
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	184.0

Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	10.0
	Max hours per month	34.0
Minimum legal wage	Min per hour	14.31
	Min per day	114.48
	Min per week	572.41
	Min per month	2490.0
Actual minimum wage	Actual per hour	16.67
	Actual per day	133.33
	Actual per week	666.67
	Actual per month	2900.0
Minimum legal overtime wage	Min per hour	21.46
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	25.5
	Actual per day	Non applicable
	Actual per week	272.0
	Actual per month	1088.0

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 sample workers in June 2024 were checked (Random month); 10 sample workers in November 2024 were checked (Random month); 10 sample workers in February 2025 were checked (Current month);

Are there different legal minimum/ legally recognised CBAs wage grades?

No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?

Above legal minimum

Indicate the breakdown of workforce per earnings

100% of workforce earning above minimum wage

Are there any bonus schemes used?

No

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. The facility increased the items about living wages in the wages and benefits policy and procedure, which ensure all employees' monthly wage exceeded the minimum living wage.</p> <p>2. The factory had conducted a survey on a decent living wage. Basic salary of 2900, higher than the local living wage 2800.</p> <p>3. The facility has a wage improvement plan for all employees.</p> <p>4. There was an annual review for the living wages.</p> <p>Details:</p> <p>1. Wages and benefits policy and procedure.</p> <p>2. Local and national laws.</p> <p>3. Local legal min wage documents.</p> <p>4. Worker interview and management interview.</p> <p>5. Investigation records for living wages.</p> <p>6. Annual review records for living wages.</p> <p>7. Comparison records for workers monthly wages and living wages.</p>		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory organized with a good controlled set of working hours policies which are understood by all employees.</p> <p>Admin manager was appointed to be responsible for compliance with work time policy. She was professional in the working hours.</p> <p>The factory had working hours procedure and the procedure was trained to every employee. But not all the area of working hours were included, such as weekly working hours were not included.</p> <p>The factory monitored the effectiveness of procedures to working hours policy, such as internal audit, but some areas of working hours were not contained in internal audit, such as weekly working hours.</p> <p>Remark: In 2024, orders decreased and production was not busy. Workers are willing to work overtime.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

1. Normally, the factory conducted 8 hours per day and 40 hours of work time from Monday to Friday.
2. Through employees' interview, overtime was voluntary.
3. The factory provided attendance records from March 01, 2024 to the audit day for review.
4. Overtime working hour was based on product order. but the order was not good enough in last year 2024.
5. The max overtime hour: 2 hours per day, 10 hours per week and 34 hours per month.
6. All workers worked one shift: 7:30-11:30; 13:00-17:00.

Details:

1. Employee interview
2. Management interview
3. Factory policy on working hours
4. Sample pay slips with recorded hours all workers interviewed
5. Workers contracts
6. Attendance records from March 01, 2024 to the audit day.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Overtime wages were paid with at the rate of 150%, 200% and 300% of normal wage according to the legal requirement.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	50.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory established discrimination policy. The procedures stipulated that the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc. female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill; training was based on working requirement. The procedures were compiled by the Management, and approved by the Manager. However, The procedure document file is missing the content of 'gender equity'.</p> <p>The factory designated Admin manager to ensure the implementation of policies and procedures prohibiting discrimination. Admin manager receive related training with the capability to identify, detect, and address such violations. but not very familiar with the content of 'gender equity'.</p> <p>Effective training and communication of policy and procedures were provided to all relevant workers, including managers and supervisors. Training was conducted according to a documented plan/ procedure, which included assessment and refresher training. Training content was updated according to need and the procedure for this is documented.</p> <p>However, through employee interviews, it was found that some employees were not aware of the specific content of 'gender equity'. Suggest that factory improve the effectiveness of training.</p> <p>The factory had set anti-discrimination target indicators, and the Admin department tracked whether there were any discrimination cases every quarter. However, the oversight was insufficient, and there was a lack of records to support the follow-up.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
7. No discrimination is practiced	7.E Have a dedicated equity approach in recru...		NC ZAF600890749

Systems and evidence examined to validate this code section

1. The factory had an anti-discrimination policy and communicated it to employees. Anti-discrimination procedure on hiring, compensation, promotion and access to training was available.
2. Admin manager was responsible for the management of this item of the code.
3. The distribution of wages follows the principle of distribution according to work and equal pay for equal work. Male and female workers received equal pay for equal work regardless of gender.
4. All interviewees stated they were treated fair despite of their native place, sex, age and so on. And they did not experience and never heard of reporting issues of discrimination.
5. There was an internal grievance process. If workers found discrimination in the factory, they could respond through the suggestion box.
6. When the factory hired the worker, did not ask the worker to do physical examination for infectious diseases, such as hepatitis B virus and HIV.
7. There was no evidence of sexual harassment.
8. There was no discrimination in hiring, compensation, accessing to training, promotion, termination or retirement.

Details:

1. Anti-discrimination policy
2. Leave application records and termination records
3. Employee handbook
4. The hiring and termination procedure
5. Attendance records
6. Training records
7. Interview with management and workers

Findings: non-compliances

ZAF600890749

Non-compliance

Code area

7 No discrimination is practiced

Status

Open*

Workplace requirement

7.E Have a dedicated equity approach in recruitment, training, development and promotion processes.

Time given to resolve

Verification method

Collaborative action required

Issue title

915 - CAR: There is no dedicated equity approach regarding recruitment, training, development and promotion processes

Area of non-compliance/non-conformance

Base code

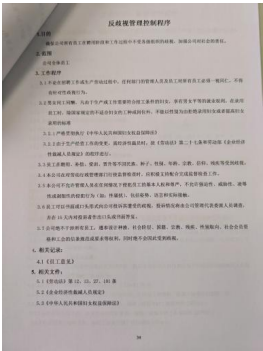
Description

After on-site communication and observation, the company has established anti discrimination procedures, but they do not include Gender Equal Approach content. Managers and employees are not familiar with the requirements related to Gender Equal Approach. 经现场沟通观察，企业建立了反歧视程序，但未包含性别平等内容。企业管理人员和员工不太了解性别平等要求。

Corrective and preventative actions

It is recommended that factory establish Gender Equal Approach policy and provide training to employees. 建议企业建立性别平等政策，并为员工提供培训。

Evidence



[NC Lack gender equal requirement.jpg](#)



* PDF generated at 03:48 (UTC) on 18 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	35%
Representation of women in managerial roles (ratio of women workers to women managers)	10%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Chinese

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory established employment policy. The procedures stipulated that all employees should be recruited by the factory directly and receive training about employment policy when employed. No labor agency was used to hire worker. No temporary worker, apprenticeship schemes or home worker according to the policy. The procedures were compiled by the Management, and approved by the General Manager.</p> <p>The Admin manager assigned a dedicated person to manage the labor contracts. This individual had been in the position for many years and was able to properly maintain the documents. After a sample review, it was found that all labor contracts were within their validity periods. Employees were receiving their corresponding wages each month as per the salary agreed upon in the contract.</p> <p>New employees were required to attend on-boarding training from the Management and the handbook was provided about the employment policy. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone. But they did not check if all employees understood the policies.</p> <p>The factory does not regularly evaluate its recruitment practices, nor does it periodically revise its recruitment requirements in accordance with its own development and changes in the law. Furthermore, it has not formulated necessary corrective measures for potential deficiencies.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- 1.The factory had established the policy of the recruitment process and the management was fully understood of the entire recruitment process.
- 2.All permanent workers were recruited by the factory directly.
- 3.The factory did not use agency recruitment.
- 4.There was no temporary worker.
- 5.Workers did not pay recruitment fee at any stage of the recruitment process.

Details:

- 1.Recruitment policy.
 - 2.The hiring and termination practices.
 - 3.Personal files and labor contracts.
 - 4.Payroll records were provided for review.
 - 5.Interview with management interview and workers.
-

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory established Sub-contracting and homeworkers policy. The procedures stipulated that no sub-contracting or home working should be used in the factory without customer authorization. This policy is approved by the general manager and communicated to all employees.</p> <p>The factory designates personnel responsible for implementing and overseeing the prohibition of homeworkers and unauthorized subcontracting within its operations, while also monitoring suppliers and subcontractors for any use of homeworkers or unauthorized subcontracting.</p> <p>The manager and workers received relevant social responsibility training, including use subcontractor requirements and homeworkers. However, through employee interviews, it was found that some employees have forgotten the relevant training content, such as under what circumstances it belongs to subcontracting. Suggest evaluating the effectiveness of the training.</p> <p>The manager strictly followed and monitored the execution of the procedure if subcontractors and homeworkers were used. But the factory did not use them. The Admin manager stated that there is currently no relevant situation in the factory, so there is no evaluation and retention of records as required by the procedures.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

1. There was a policy in place to manage sub-contractor, home working and external processing.
2. The factory produced all the products and processes by themselves.
3. There was no home worker used by the factory.
4. The factory had established a list of approval suppliers. The factory assessed its suppliers and subcontractor on social accountability, QMS, and relevant assessment records were available.
5. If the client's products need subcontractor, the factory would inform the main clients. Therefore, no apparent concern was detected regarding this section.

Details:

1. List of approval suppliers.
2. Interview with management and workers.
3. Site tour.
4. Production records.

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No
 There was no homeworker found during this audit.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No
 There was no unrecorded work or undeclared sub-contracting on site.

Are any sub-contractors used?

No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The factory established no harsh or inhumane treatment policy. The procedures stipulated that no harsh or inhumane treatment in factory. If similar incidents occur, report to the management immediately. The procedures were compiled by the Management, and approved by the General Manager. The factory has established multiple complaint channels such as suggestion boxes and supervisor hotlines, allowing employees to make complaints anonymously.</p> <p>The admin manager is authorized to address various reasonable demands made by employees within the scope of their authority, she was professional in the harsh or inhumane treatment.</p> <p>New employees were required to attend on-boarding training from the Management and the handbook was provided about No harsh or inhumane treatment policy. According to factory management and workers interview, Some employees have expressed that they have forgotten the content of the training, such as what humane treatment refers to. Suggest evaluating the effectiveness of the training.</p> <p>The facility management strictly implements monitoring no harsh or inhumane management procedures in accordance with PDCA system, taking action or making changes to policies and procedures as results require. Monitoring ensures that the workplace requirements of this base code are adequately managed on an ongoing basis. However, as mentioned earlier, the factory receives monthly employee feedback boxes with a record of 'no issues'. Suggest evaluating the effectiveness of employee feedback in the suggestion box.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

1. As per management interview, document review and workers interview, there was a policy on Harsh Treatment. The policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
2. There was an internal process for grievance, which was an anonymous suggestion box. Workers could report any grievances anonymously (harassment, bullying, discrimination etc.).
3. According to the documentation, the factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination. The factory had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
4. Through workers interview, it was confirmed that there was no harsh or inhumane treatment.
5. No negative evidence of mental/physical abuse, sexual or other harassment and verbal abuse was identified during the audit.
6. The anti-harsh or inhumane treatment policy and disciplinary procedure were communicated to the employees through regular training.
7. Neither agency staff nor foreign worker was found during this audit.

Details:

1. The relevant policy on prevention of harassment and abuse
2. Interview with management and workers
3. Site tour
4. Internal grievance procedure documentation
5. Training records
6. Grievance records

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?

Yes, there is a formal grievance process

What type of grievance mechanism(s) are available?

1 suggestion box was set in workshop, workers could report any grievance (harassment, bullying, discrimination etc.) and any received complaint would be handled by managers, without any reprisal for the worker in question.

Number of grievances raised in the last 12 months 0

Number of grievances resolved in the last 12 months 0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>The facility's policy to "Promote environmental protection work and enhance enterprise environmental awareness" outlined the systems in place to manage this issue at the site, including all relevant requirements of the code area.</p> <p>The factory appointed the admin manager responsible for implementing policies. The meeting minus with employees especial the management level about the environment issues was kept properly. The admin manager had been working in the factory for many years and has a good understanding of the policy content and the situation of the factory. However, admin manager is not particularly familiar with latest update requirements and regulations during the management interview.</p> <p>The manager received environmental protection related law training. They used this knowledge to develop effective procedural documents and to conduct training for factory workers. However, through employee interviews, it was found that some employees were unclear about the environmental training content. They stated that the content was quite professional and they had forgotten about it. Suggest the factory to improve the effectiveness of training.</p> <p>The factory collected monthly data on water and electricity usage, but After evaluating the energy data, effective water-saving and energy-saving measures were not taken.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- 1.The factory had policies and procedures for environmental protection.
- 2.Admin manager was responsible for continuous improvements in their environmental performance.
- 3.The factory had provided environment training for relative management and workers per year and kept relative training records.
- 4.The factory had the Fixed source discharge registration.

Details:

- 1.Environment policy & procedure
- 2.Worker and management interviews
- 3.Record of environmental impact appraisal document
- 4.Site tour

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	NA
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1. Admin manager was responsible for the environment management system in the facility.</p> <p>2. The facility established environmental management system. The laws and regulations of environmental protection and clients' environmental standards were collected and updated regularly.</p> <p>3. The facility management maintained all legally required environmental documents in place which proved that the production of the facility was in compliance with the related environmental regulations.</p> <p>4. All of the legally required certificates including the environmental impact assessment report form for construction projects, etc were available and valid during this audit.</p> <p>5. Every year, the facility had statistical records of the usage and emission of natural resources, such as energy usage and water usage.</p> <p>6. Per facility tour and document review, the annual monitoring report for waste air, waste water and noise showed the pollutant discharging was compliant with environmental law.</p> <p>7. Based on management and worker interview, they were trained on environmental protection.</p> <p>8. There were no any fines or prosecutions for noncompliance to environmental regulations.</p> <p>Details:</p> <p>1. The relevant policy on prevention of environment.</p> <p>2. Pollutant Discharge Registration Form.</p> <p>3. Training records.</p> <p>4. Interview with management and workers.</p> <p>5. Wastewater, exhaust gas and noise detection record.</p> <p>6. Hazardous waste disposal contract and transfer records.</p> <p>7. Energy Consumption Record</p>		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Prioritising local suppliers
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The site had a system in place to keep up date with environmental and chemical legal requirements for destination countries.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs)
Are any of these science-based targets?	No, and we do not intend to set one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes During documental review, it was noted targeted reduction of environmental aspects in compliance.
Has the site 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?	Not Applicable

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	177,845	214,344
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available

Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	0	0
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,237	1,415
Water discharged	Sewage pipeline	Sewage pipeline
Water volume discharged (m3)	Data not available	1,410
Water volume recycled (m3)	0	0
Total waste produced (mt)	4	4.6
Total hazardous waste produced (mt)	0.3	0.5
Waste to recycling (mt)	3.7	4.1
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	169	211

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The factory anti-bribery and anti-corruption policy and procedure outlining the systems in place to manage this issue at the site. The management system was strengthened by specific policies and processes, including the implementation of controls for compliance with the requirements of the workplace.</p> <p>The factory appointed the administrative manager responsible for implementing policies. The meeting minutes with employees especial the management level about the business ethics was kept properly. The administrative manager had been working in the factory for many years and has a good understanding of the policy content and the situation of the factory.</p> <p>Training was conducted according to the documented procedure, which included assessment and refresher training. All training records were kept for at least 12 months. The factory had formal communication or training on this topic. All employees, including production workers, managers and supervisors had been formally trained on this topic.</p> <p>Adherence to the processes is monitored via departmental reporting to the admin manager, and there was a mechanism to monitor whether procedures had been implemented by operational personnel.</p>

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- 1.The Manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery, based on documents review and workers interview, the factory provided the training on Business Ethics policy to the staffs.
- 2.The factory had a transparent system in place for confidentially reporting and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
- 3.Workers could raise Business Practice issues directly to factory manager.
- 4.The factory had established a business ethics system, covering bribery, corruption, and any type of fraudulent Business Practice.

Details:

1. Worker handbook
2. Management interviews
3. Training records

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	NA

Attachments



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5-01B_Ningbo Yiheng
Art&Craft Co Ltd_7-8 April
2025_Photo Form.pdf](#)



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