

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and 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 code areas below.

2-pillar audits include:

- Labour standards:
 - 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
 - 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
- Health and safety:
 - 3. Working conditions are safe and hygienic
- Environment:
 - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
 - 10.B. Environment 4-pillar
- Business ethics:
 - 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 details

Site details

Sedex site reference	ZS1000086517	Site name	SUZHOU ACCUM PACKAGING CO LTD
Business name	SUZHOU ACCUM PACKAGING CO LTD	Site address	Zhujiabang Village, Zhenze Town, Wujiang District, Suzhou City & No.588 Minggang Road, Zhenze Town, Wujiang District, Suzhou City 苏州市吴江区震泽镇朱家浜村 & 江苏省苏州市吴江区震泽镇明港大道588号 苏州 CN 215200

Audit details

Sedex company reference	ZC5000072938	Auditor company name	TUV Rheinland (TUEV Rheinland)	
Audit company address	Am Grauen Stein, Cologne, DE, 51105			
Date of audit	2025-10-16	Audit conducted by	Amber Gong	
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics			
Time in and out	Day 1		Day 2	
	In	09:30	In	09:30
	Out	17:30	Out	13:30

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Audit type	Full initial
Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Xiao Qing / Management Representative
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 in the facility.		
Reason for absence during the audit	There was no union in the facility.		
Reason for absence at the closing meeting	There was no union in the facility.		

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 audit with window: Oct 9– Nov 6 2025 (4 weeks)

Lead auditor

Amber Gong

APSCA Number

21705389

Additional auditor

Date of declaration

2025-10-17

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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	Xiao Qing
Title	Management Representative
Date of declaration	2025-10-17

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601152640
	3.N Ensure that all hazardous substances (e.g...	Local law Base code	NC ZAF601152639
	3.R Provide clean and secure toilets, wash ar...	Local law Base code	NC ZAF601152638
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601152641

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

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	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	ZC5000072938	
Sedex site reference	ZS1000086517	
Company name	SUZHOU ACCUM PACKAGING CO LTD	
Business ownership type	GOODS	
Site name	SUZHOU ACCUM PACKAGING CO LTD	
Site name in local language	苏州齐聚包装有限公司	
GPS location	GPS address	Zhujiabang Village, Zhenze Town, Wujiang District, Suzhou City & No.588 Minggang Road, Zhenze Town, Wujiang District, Suzhou City, 苏州市吴江区震泽镇朱家浜村 & 江苏省苏州市吴江区震泽镇明港大道588号
	Coordinates	30°53'53" N, 120°28'37"E & 30°54'5" N, 120°27'22"E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Shen Qin
	Job title	Sales Manager
	Phone number	0512-63786310
	Email	info@accumpackaging.com

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

1. The business license number is: 91320509MA1MH4DU0H and the valid date is from 31 Mar 2016 to long term.
2. Building Structure Safety Certificate issued on Nov 29, 2006 and on Nov 23, 2022
3. Fire Safety Certificate : 吴公消验【2006】第0066号. Date of issue: Jan 6, 2023./吴住建消备字【2023】第0010号. Date of issue: Jan 6, 2023.
4. Fixed source pollution discharge registration: 91320509MA1MH4DU0H001P. Valid Date: from 22 Apr 2025 to 15 Apr 21 2030.
5. Food business license number is: JY33205840604885 and valid to Mar 2, 2030

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of corrugated paper and paperboard and of containers of paper and paperboard
	Secondary	
	Other	
Product type	The main products manufactured by the factory were paper bowl, paper cup and paper lid.	
Process overview	<p>The main products manufactured by the factory were paper bowl, paper cup and paper lid.</p> <p>Both sites have the following production processes: printing, die cutting, forming, inspection and packing.</p> <p>Number of production lines: 3</p> <p>Main equipment used: Flexographic printing machines, die-cutting machines, punching machines, forming machines and packaging machines.</p>	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	25000m ²

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[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2022
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	1F: Printing 2-3F: Office
Building 2	Last construction works on site	2022
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	1F: Canteen 2-3F: Office
Building 3	Last construction works on site	2022
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	1F: Printing, die cutting, forming, inspection and packing workshops and warehouse 2F-3F: Idle
Building 4	Last construction works on site	2022
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	1-2F: Warehouse 3F: Idle

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Site scope

Building 5	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	1-2F: office
Building 6	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	1-2F: Rest room
Building 7	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	1F: Printing, die-cutting, forming, inspection, packing workshops and warehouse 2F: Office
Building 8	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	1F: warehouse

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Site scope

Building 9	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	1F: warehouse

Building 10	Last construction works on site	2006
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	1F: Canteen

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
No transport provided by the facility.

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Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	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 shift work at the site? Yes

Office workers had 1 shift: 8:00-11:30, 12:30-17:00; OT: 18:00-20:00.
 Production workers had 2 shifts: 8:00-11:30, 12:30-17:00; OT: 18:00-20:00; 20:00-23:30, 00:30-5:00; 6:00-8:00. Canteen worker: 9:00-12:30, 13:30-18:00.

What percentage of the workforce, including temporary and agency workers, work during the night shift? 40%

Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling? No

Document sample covered all shifts workers but the interview only covered the day shift workers.

Site assessments

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

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Site assessments

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 facility did not conduct such assessment.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?

No

The facility did not conduct Human Rights Impact Assessment (HRIA).

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Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	22 (57.9%)	16 (42.1%)	- -	38 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	22 (57.9%)	16 (42.1%)	- -	38 (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

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[Worker interviews →](#)

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	15 (51.7%)	14 (48.3%)	- -	29 (76.3%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	15 (51.7%)	14 (48.3%)	- -	29 (76.3%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Migrated workers were from Guizhou, Henan, Jiangxi and Sichuan Province.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (33.3%)	2 (66.7%)	- -	3 (7.9%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? Yes

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	58%	42%	-	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	22 (57.9%)	16 (42.1%)	- -	38 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	22 (57.9%)	16 (42.1%)	- -	38 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

Not applicable. All employees were paid monthly.

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%)	1 (100%)	- -	1
Administrative staff	0 (0%)	1 (100%)	- -	1

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[Worker interviews →](#)

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group 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 5 workers with 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)

Not applicable. No concern or complaint was raised by the employees. All employees interviewed had a positive attitude to management and site.

What did the workers like the most about working at this site?

Communication (e.g. from management)
 Freedom of movement
 Overtime
 Pay
 Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)
 Work atmosphere (e.g. treatment by supervisors)

Additional comments

10 employees were selected for interview including 3 females and 7males. 5 employees were interviewed individually, and 5 employees were interviewed as 1 group. The employees were assured of confidentiality, and they spoke freely of their views of the facility. All employees stated they were satisfied with their employment and the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions used.

Attitude of workers' committee/union representatives

workers representatives were favorable with the management and facility environment. No negative information was raised. The worker committee representative was satisfied with the management, working conditions, and she stated that they could give suggestions on all parts of the site's practices.

Attitude of workers

Attitude of managers

The facility management showed a positive attitude to this audit during the whole process. All necessary documents were provided timely, and a private room was arranged for employee interview. At the end of the audit, all the findings were accepted by the facility management. No negative information was raised by managers.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	5	0	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	3	3	-	6
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	3	3	-	6

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)	2.0%	4.0%	-	6.0%
Previous full calendar year (2023)	4.0%	2.0%	-	6.0%

* 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)	2.0%	5.0%	-	7.0%
Last full calendar year (2024)	4.0%	9.0%	-	13.0%
Previous full calendar year (2023)	5.0%	6.0%	-	11.0%

Number of days lost through job absence in the year, calculated as: $(\text{Number of days lost through job absence in the year}) / [(\text{Number of employees on 1st day of the year} + \text{Number of employees on the last day of the year}) / 2] * (\text{Number of available workdays in the year})$.

Are accidents recorded? Yes

Accidents records were provided for review and it showed no accident happened in past 24 months.

[← Worker interviews](#)

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Annual number of work related accidents and injuries (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 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 total 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%

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[Code area 0 →](#)

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

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%
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Percentage of workers that work on average more than 60 total 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%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ol style="list-style-type: none"> 1. The factory management agreed that the auditor could access to all facilities, compound documents and records requested by the audit; to take photo of the factory, to copy relevant document records and conduct confidential workers interview. 2. The factory established a business ethics policy which was communicated to workers through posters and training. 3. The factory had established written human rights policy statement, and communicated to all personnel. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. The company business ethics policy 2. Training records 3. Worker interview and management interview 		

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

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	Some Improvements Recommended
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

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures 'Employment is freely chosen', taken regularly review & update and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable in the Base Code Area now and over time through regular review.

2. Resources: SIR

There was a responsible person available for ensuring implementation of site policies, however, no regular training was available to ensure the management meet the requirement. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.

3. Training and communication: R

The factory had developed an annual training plan and trains employees according to the plan, and they had evaluated the effectiveness of employee training, and interviewee knew the requirement.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1.The factory had established the effective employment policies & program.Employees could be freely resignation after communication with management in advance 30 days notification.
- 2.The employees obtained their job by HR market or by friend's recommendation.
- 3.The workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
- 4.The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- 5.Contract for security guards state that they must not prevent workers from leaving the premises outside of working hours and where they are conducting searches that this is at the request of management, is done on a sample basis and is performed discretely and without significant delay to workers leaving at the end of shift.
- 6.No forced, bonded or involuntary prison labour was identified during the audit.

Evidence examined:

- 1.Factory rules
- 2.Employee handbook
- 3.Personnel files
- 4.Resignation records
- 5.Worker contracts
- 6.Management and worker interview

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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R
 Factory had established documented policy and procedures on recruitment, take regularly review & update and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review..
2. Resources: R
 There was a responsible person available for ensuring implementation of site policies, and regular training was available for her to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.
3. Training and communication: SIR
 The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly
4. Monitoring: R
 The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

1. Based on document review, management and worker interview, all workers in the factory were Chinese. All workers had the proper legal rights to work in this region. All of them were recruited directly by the factory and no agency was involved in the factory's recruitment processes.
2. Recruitment procedures and employment procedures, the factory had established Recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment.
3. No agency staff or foreign worker was used by the factory.
4. The factory collected related laws on entitlement to work and immigration.
5. No workers were found to pay recruitment fees or related costs. No recruitment fees or related costs were incurred or charged to workers. According to the procedure documents provided by the factory, if an worker advances any expensed during the recruitment and onboarding process, the factory would reimburse the employee in the month of employment.

Evidence examined:

1. Hiring procedure
2. Personnel files and labour contracts
3. Employee handbook
4. Employee roster
5. Worker interview and management interview

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 (excluding 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?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
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[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 76%

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 Migrated workers were from Guizhou, Henan, Jiangxi and Sichuan Province.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

No such fee or cost was paid by workers during the recruitment and employment process.

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

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

Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on freedom of association, take regularly review & update the policy and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: SIR

There was a responsible person available for ensuring implementation of site policies, however, no regular training was available for her to ensure the management meet the requirement. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

1. The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents 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 are under the management of ACFTU. And most of the trade union representatives are appointed directly by it.
2. Based on document review, management review and worker interview, three worker representatives were elected in factory on 21 Mar 2025 and the worker representative meeting was conducted once time quarterly. The meeting records were provided for review.
3. Through worker interview, the worker could rise up their opinion through worker representative or communicate with their supervisor.
4. Workers could raise their grievances or complaint to their worker representative or management directly.

Evidence examined:

1. The policy on freedom of association
2. Minutes of the works committee meeting
3. Interview with workers and management
4. Interview with workers committee members
5. Worker representative elected records

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

Data points

Are trade unions allowed by law in the national context?	Yes
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

[← Code area 2](#)

[Code area 3 →](#)

3. Working conditions are safe and hygienic

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

Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. Policies and Procedures: R
 Factory had established documented policy and procedures on health and safety, take regularly review & update the policy and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: SIR
 There was a responsible person available for ensuring implementation of site policies and the responsible person had trained by local authority and obtained the Safety production management certificate, meanwhile, regularly training was required to meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.
3. Training and communication: SIR
 The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly
4. Monitoring: FIR
 The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. However, the non-compliance on chemical storage goods storage and the noise in workshop has exceeded law limit were identified, and it is recommended that improvements should be made to strengthen the management system and enhance its overall effectiveness.
 For the factory using chemicals, normally, there was a risk of chemical operation management, and most factory didn't equipped secondary containment for all chemicals.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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3. Working conditions are safe and hygienic

3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601152640
3.N Ensure that all hazardous substances (e.g...	Local law Base code	NC ZAF601152639
3.R Provide clean and secure toilets, wash ar...	Local law Base code	NC ZAF601152638

Systems and evidence examined to validate this code section

Current Systems:

1. General Health and Safety management
 - Ms. Xiao QIng / Management Representative is responsible for issue of Health & Safety in the factory.
 - Minutes of meetings show that there were monthly meetings between H&S committee and H&S manager.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Sufficient clean toilets segregated by gender were available at all times to workers.
 - The factory provided potable water to workers free of charge in workshop.
2. Fire Safety
 - Evacuation plans were posted in workshop and understood by all interviewed workers.
 - Sufficient fire-fighting equipment such as fire extinguishers, fire alarm, hydrants, emergency lights and exit signs in production building. Regular inspection was taken by the factory per month.
 - There were at least two exits available for workshop.
 - The fire acceptance certificate was provided for review.
3. Electrical safety
 - Fire drill was conducted twice per year, the latest one in the factory was on 30 Jul. 2025, records were available, and all workers were covered.
 - The electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - One electrician was available in the factory and the qualification certificate was provided for review.
4. Medical services
 - Sufficient first aid kits in the production area and they were well stocked.
 - Two trained first aiders were available in the factory, and the qualification certificates were provided for review.
5. PPE
 - The factory provided PPEs for workers where necessary freely.
 - Related PPE warning signs were posted onsite.
6. Special equipment
 - Factory had obtained safety use tag and valid inspection report for all special equipment.

Evidence examined:

1. Health and safety policy
2. Health and safety manual
3. Fire equipment maintenance records
4. Training records
5. Fire drill records
6. Trained first aider certificates

7. Accident records
 8. Interview with factory management and workers
 9. Onsite observation
 10. Worker interview and management interview
 11. Safety use tag and valid inspection report for special equipment
-

Findings: non-compliances

ZAF601152640

Non-compliance

Due 2025-11-25

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Time given to resolve

30 days

Issue title

308 - Insufficient action taken to improve conditions following air quality, dust level, noise or temperature assessment where necessary

Verification method

Desktop audit

Description

Based on management interview and document review, the noise in die-cutting workshop and forming workshop has exceeded law limit, reaching 92.5 db.

根据管理层访谈和文件审阅，模切车间和成型车间里噪声超过法定限值，最大达到92.5分贝。

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

It is recommended that the factory immediately take corresponding measures to control occupational hazard factors to ensure that it meets the requirements of occupational health environment and conditions.

建议工厂立即采取相应的职业危害因素治理措施，确保其符合职业卫生环境和条件的要求。

Local law reference

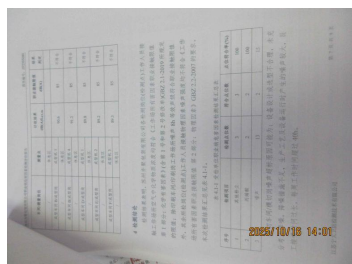
Provisions on the Administration of Occupational Health at Work

Sites (2021) Article 22 When an employer discovers during routine monitoring of occupational disease hazards or regular detection and current assessment that the occupational disease hazard factors in the workplace do not meet the national occupational health standards and hygiene requirements, it shall immediately take corresponding remedial measures to ensure that they meet the requirements of the occupational health environment and conditions.

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[noise test report.JPG](#)



* PDF generated at 14:36 (UTC) on 26 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601152639

Non-compliance

Due 2025-11-25

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Ensure that all hazardous substances (e.g. chemicals and pesticides) are officially registered where possible, Material Safety Data Sheets are used, and they are managed appropriately at all times in line with registration and safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Verification method

Desktop audit

Issue title

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

Area of non-compliance/non-conformance

Local law

Base code

Description

Based on factory tour, hazardous chemicals (about 50%) such as printing ink in chemical workshop were not stored with anti-leakage device.

根据现场观察，化学品仓库里的油墨等危险化学品（约50%）没有设置防泄漏装置。

Corrective and preventative actions

The factory should install the secondary containers for all chemicals. 工厂应为所使用的化学品设置二次容器。

[← Code area 3](#)


[Code area 4 →](#)

Local law reference

In accordance with Regulation for Safety of Dangerous Chemical article 20, entities that produce, store, and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, firefighting, explosive prevention, pressure release, gas defense, antisepsis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely.

Evidence



[printing ink in chemical workshop were not stored with anti-leakage device.JPG](#) 

* PDF generated at 14:36 (UTC) on 26 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601152638

Non-compliance

Due 2025-12-25

Code area

3 Working conditions are safe and hygienic

Status

Open*

[← Code area 3](#)

[Code area 4 →](#)

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

Verification method

Desktop audit

Issue title

327 - Storage of goods not in line with legal requirements (e.g. too high)

Area of non-compliance/non-conformance

Local law

Base code

Description

Based on site observation, the distance between the item and the wall is less than 0.5m in the warehouse.

根据现场观察，仓库内货物与墙的距离小于0.5m。

Corrective and preventative actions

The factory should keep the distance between the item and the wall is not less than 0.5m in the warehouse.

工厂应保持仓库内货物与墙的距离不小于0.5m。

Local law reference

General rules for fire safety management of storage occupancies (XF 1131-2014) Article 6.8
The stacking items in the warehouse should meet the following requirements: a) The distance between the upper part of the stacking and the floor and the flat roof is not less than 0.3m (the hermitage roof truss is calculated from the beam); b) The distance between the item and the lamp is not less than 0.5m; c) The distance between the item and the wall is not less than 0.5m; d) The distance between the stack and the column is not less than 0.3m; e) The distance between the stacking of articles and the stacking is not less than 1m.

Evidence



[the distance between the item and the wall is less than 0.5m.JPG](#)

[← Code area 3](#)

[Code area 4 →](#)

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[← Code area 3](#)

[Code area 4 →](#)

Audit company:
TUV Rheinland (TUEV Rheinland)

Audit reference:
ZAA600162181

Start Date:
2025-10-16

End Date:
2025-10-17

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?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	Yes Chemicals such as printing ink and machines oils used in the factory.
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 Not applicable. There was no structural additions (e.g. added floors) in the facility.
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

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

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	Some Improvements Recommended
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

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on forbidden to recruited child labor, and special protection on young worker, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: SIR

There was a responsible person available for ensuring implementation of site policies and he had good awareness and taken periodic training to ensure to meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.

3. Training and communication: R

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. The policy was published to workers, and the interviewees knew the basic requirement of child labor and special protection on young worker. Due to effective assessment of understanding of those receiving training and/ or communications, factory can ensure a high level of efficacy.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1.The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their copies of ID card were kept in their personnel file. And the policy stated that the factory never employ and use any child labour under the age of 16 years old.
- 2.The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, no young worker worked in factory.
- 3.Checks of all workers files showed that the youngest worker on site was 20-years-old who born on 15 May, 2005 and recruited on 29 Dec, 2023. No young workers worked in factory.
4. The factory also has a written child labor remedy procedure, it defined that if child labor was identified, the facility would Stop child labor's work and arrange him/her to have health examination of free charge, and to be returned to his/her home town accompanied by his/her parents or relatives and bear the associated costs, or provide adequate financial and other support to enable such a child to attend and remain in school until no longer a child (under 16 years old).

Evidence examined:

- 1.Policy on workers recruitment
- 2.Personnel files including the ID card copies of workers
- 3.Roster and labour contracts of all workers
- 4.Worker interview and management interview

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	7%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	20
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

[← Code area 4](#)

[Code area 5 →](#)

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	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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on salary and welfare, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: SIR

There was a responsible person available for ensuring implementation of site policies, however, no regular training was available to ensure the management meet the requirement. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.

3. Training and communication: SIR

The facility had developed an annual training plan, trains employees according to the plan and the training records were provided for review. However, they had not evaluated the effectiveness of employee training.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1.The local legal minimum wage was RMB2490 per month (the same as RMB14.31 per hour) since 1 Jan. 2024.
- 2.All workers were paid by hourly rate. The factory paid at least RMB5500 per month (i.e. RMB31.61 per hour) since Sept, 2024, which was higher than local legal requirement.
- 3.The calculated period was from the 1st to the end of month. All employees were normally paid on or before 30th of each month by bank transfer and the pay slips were also given to employees when the wages issued.
- 4.All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 5.All workers were provided with social insurance.
- 6.Through document review and employee interview, the numbers of employees on attendance and payroll records were consistent with the number of employees in the employee register.
7. All employees were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the structure of their wages for the pay period concerned each time that they were paid.
8. Production records were randomly reviewed to cross check with the attendance records. No inconsistency had been found. Thus, the compliance status of wage issues could be verified in this audit.
8. All interviewees expressed that no deposit in this site.
9. Based on the provided records and employee interview, the site provided paid leaves such as annual leave, sick leave, maternity leave etc. to employees as per law.

Evidence examined:

1. Local and national laws
2. Wages and benefits policy
3. Local legal minimum wage documents
4. Payroll records for the period from Sept 2024 to Aug 2025 and attendance records from 1 Sept 2024 to audit date were provided for review.
5. Leave records
6. Social insurance and payment receipts from the local labor department
7. Labor contracts for all selected employees (to examine agreed wage rates)
8. Resignation records
9. Pay slips of all employees interviewed
10. Production records, such as daily production records, material in/out records and etc. to cross check hours
11. Employee interview and management interview

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Other (provide details) Wages meet a living wage The legal minimum wage All employees were paid by hourly rate, and the minimum hourly rate in the facility was RMB 31.61 per hour.
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
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

[← Code area 4](#)

[Code area 5.A →](#)

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	174.0
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	12.0
	Max hours per month	52.0
Minimum legal wage	Min per hour	14.31
	Min per day	572.41
	Min per week	114.48
	Min per month	2490.0
Actual minimum wage	Actual per hour	31.61
	Actual per day	252.87
	Actual per week	1264.37
	Actual per month	5500.0

Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	47.41
	Actual per day	94.83
	Actual per week	1326.64
	Actual per month	5306.56

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 samples from 1st Aug to 31st Aug 2025 (current month) 10 samples from 1st Apr to 30th Apr 2025 (random month) 10 samples from 1st Dec to 31st Dec 2024 (random 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	Wages of 100% workers above legal minimum wage.
Are there any bonus schemes used?	No

Were accurate records shown at the first request? Yes

Were any inconsistencies found? No

[← Code area 5](#)

[Code area 5.A →](#)

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current Systems:</p> <ol style="list-style-type: none"> 1.Factory has established 'living wage' calculate procedure, and Mr. Zhou Xingguo / GM was responsible for regular calculating the 'living wage'. 2.The factory has calculated the living wage to ensure that the total salary (including benefits) of all employees exceeds the minimum living wage. 3.The factory has a wage improvement plan for all employees. 4.There is an annual review when local wage rates were examined. 5.The factory calculated the living wage by wage indicator typical family methodology. According to the sampled living wage records, the factory included the transportation, education, food, clothes, housing, energy using, unexpecting needs and savings, etc, into the living wage. The minimum living wage was RMB2805 per month; excluding the overtime wage, factory paid the total wage of RMB5500 per month for workers at least. <p>Evidence examined</p> <ol style="list-style-type: none"> 1.Wages and benefits policy and procedure 2.Local and national laws 3. Living wage documents 4.Overtime premiums records 5.Labour contracts for all workers 6.Worker interview and management interview 		

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

Some Improvements Recommended

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

Fundamental Improvements Required

Management systems

Explanation for management systems grades

1. Policies and Procedures: R
Factory had established documented policy and procedures on Attendance Management, Overtime regulations and etc, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: SIR
There was a responsible person available for ensuring implementation of site policies, however, no regular training was available to ensure the management meet the requirement. Future risks may occur if the owner and/or the Factory Director do not obtain the most update legal and/or client's requirements in time.
3. Training and communication: R
The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review
4. Monitoring: FIR
The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the noncompliance. However, the non-compliance on monthly overtime hours was identified, and it is recommended that improvements should be made to strengthen the management system and enhance its overall effectiveness.
For the facility industry in China, normally, there was a risk of monthly overtime hours exceeding the limit of 36 hours.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601152641

Systems and evidence examined to validate this code section

Current Systems:

1. The factory provided attendance records from 1 Sept. 2024 to the audit date for review.
2. The working time of workers were recorded by face scan machine.
3. According to time records and worker interview, the normal working hour were 8 hours per day and 40 hours per week. According to the attendance record review, management interview and workers interviews, all workers worked for 5 days per week, 8 hours per day. Office workers had 1 shift: 8:00-11:30, 12:30-17:00; OT: 18:00-20:00.
Production workers had 2 shifts: 8:00-11:30, 12:30-17:00; OT: 18:00-20:00; 20:00-23:30, 00:30-5:00; 6:00-8:00. Canteen worker: 9:00-12:30, 13:30-18:00.
4. Based on attendance records provided by factory from 1 Sept. 2024 to the audit date, the workers' monthly overtime hours exceed local legal requirement. The max daily OT was 2 hours and the max monthly OT was 52 hours (Happened in Apr 2025). All workers had one day off in a week.
5. Through employees' interview, overtime is voluntary.

Evidence examined:

1. Factory policy on working hours
2. Local and national laws
3. Workers contracts
4. Sample pay slips with recorded hours all interviewed workers
5. Attendance records from 1 Sept, 2024 to the audit date
6. Quality and production records to cross check working hours
7. Interview with workers and management

Findings: non-compliances

ZAF601152641

Non-compliance

Due 2025-12-25

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

60 days

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Verification method

Follow up audit

Description

Based on the attendance records from 1 Sept, 2024 to the audit date provided by the factory. Auditors sampled 10 samples from the attendance records in Dec 2024, Apr 2025 and Aug 2025 separately, details as below:

1. 10 workers (covered all production positions) in Dec 2024 (random month) had overtime worked 50 hours per month ;
2. 10 workers (covered all production positions) in Apr 2025 (random month) had overtime worked 52 hours per month ;
3. 10 workers (covered all production positions) in Aug 2025 (current month) had overtime worked 50 hours per month.

It was not met with legal requirement (maximum 36 hours overtime per month).

根据工厂提供的 2024年9月1日至审核当天的考勤记录。审核员从考勤记录中分别从2024年12月、2025年4月和2025年8月份各抽取了10个样本，具体如下：

1. 10名工人（涵盖所有生产岗位）在 2024年12月份（随机月份）的月加班时间为50小时；
 2. 10名工人（涵盖所有生产岗位）在 2025年4月份（随机月份）的月加班时间为52小时；
 3. 10名工人（涵盖所有生产岗位）在 2025年8月份（当前月份）的月加班时间为50小时。
- 这不符合法规（每月最大 36 小时）的要求。

Area of non-compliance/non-conformance

Local law

Base code

Corrective and preventative actions

The factory should ensure all workers' monthly overtime hours comply with legal requirement.

工厂应保证员工的月加班时间符合法规要求。

[← Code area 6](#)

[Code area 7 →](#)

Local law reference

Labor Law of the People's Republic of China (2018 Amendment), Article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty six hours.

Evidence

部门	日期	星期	打卡1	打卡2	打卡3	打卡4	打卡5	打卡6	打卡7	打卡8
生产A	2025-09-01	一	19:52	23:30						
生产A	2025-09-02	二	00:28	05:00	05:50	08:08	10:57	23:30		
生产A	2025-09-03	三	00:21	05:04	19:57	23:31				
生产A	2025-09-04	四	00:23	05:07	05:46	08:03	20:00	23:21		
生产A	2025-09-05	五	00:27	05:11	19:58	23:37				
生产A	2025-09-06	六	00:19	05:10	19:56	23:30				
生产A	2025-09-07	日	00:29	05:11						
生产A	2025-09-08	一	07:54	11:31	12:27	17:05	19:00	20:07		
生产A	2025-09-09	二	07:57	11:30	12:21	17:09				
生产A	2025-09-10	三	07:51	11:30	12:20	17:05				
生产A	2025-09-11	四	07:57	11:34	12:27	17:00	17:59	20:11		
生产A	2025-09-12	五	07:50	11:36	12:29	17:08				
生产A	2025-09-13	六	07:54	11:31	12:19	17:02				
生产A	2025-09-14	日								
生产A	2025-09-15	一	07:53	11:33	12:30	17:11				
生产A	2025-09-16	二	07:50	11:33	12:25	17:07				
生产A	2025-09-17	三	07:56	11:30	12:29	17:06				
生产A	2025-09-18	四	08:00	11:35	12:25	17:10				
生产A	2025-09-19	五	07:50	11:35	12:22	17:05	17:56	20:00		
生产A	2025-09-20	六	07:46	11:34	12:30	17:05				
生产A	2025-09-21	日								
生产A	2025-09-22	一	19:56	23:35						
生产A	2025-09-23	二	00:25	05:05	19:59	23:38				
生产A	2025-09-24	三	00:20	05:11	05:00	08:05	10:59	23:40		
生产A	2025-09-25	四	00:20	05:02	19:50	23:31				
生产A	2025-09-26	五	00:20	05:10	05:00	08:07	10:50	23:30		
生产A	2025-09-27	六	00:19	05:03	19:59	23:31				
生产A	2025-09-28	日	00:30	05:01						
生产A	2025-09-29	一	19:51	23:31						
生产A	2025-09-30	二	00:25	05:09	19:52	23:30				



[working hour records\(current paid month\).png](#)

* PDF generated at 14:36 (UTC) on 26 Oct 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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?	Not applicable. As per local law, the facility should pay no less than 150%, 200% and 300% of normal rate for employees' overtime working in normal working day, rest days and official public holidays respectively
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?	51.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	52.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on discrimination, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

1. According to management and workers interview, 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.

2. There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement.

3. There was no evidence of sexual harassment.

4. There is a dedicated equity approach in recruitment, training, development and promotion processes:

Recruitment: Factory has formulated clear and objective recruitment standards, and recruits through multiple channels, and adopts a fair screening process.

Training: Factory has established a fair training needs assessment mechanism, provides equal training opportunities for employees through various ways, and evaluates the training effects objectively.

Development: Factory has developed a fair resource allocation plan, and strengthens the capacity building by formulating personalized capacity improvement plans for employees and adjusting them regularly.

Promotion: Factory has formulated transparent promotion standards, ensures the fairness of promotions by setting up an assessment committee and adopting a multi dimensional assessment method, and at the same time has established a fair appeal mechanism.

Evidence examined:

1. The hiring and termination procedure
2. Leave application records and employee handbook
3. Labour contract
4. Termination records
5. Attendance and payroll records
6. Training records
7. Worker interview and management interview

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)? 6%

Representation of women in managerial roles (ratio of women workers to women managers) 6%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 6%

Three most common nationalities in managerial and supervisory roles All managers and supervisors were 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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on regular employment, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to
validate this code section**

Current Systems:

1. All employees were recruited by the factory directly. No labour agency was used to hire workers. No temporary worker, apprenticeship schemes or home worker was identified by the auditor.
2. All interviewed workers had received a signed labour contract.
3. All sampled workers' personal files were provided for review.

Evidence examined:

1. The hiring and termination procedure
2. Personal files
3. Payroll records were provided for review
4. Labour contracts
5. Worker interview and management interview

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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on sub-contracting and homeworkers, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

Systems and evidence examined to validate this code section

Current Systems:

It was verified through document review, factory tour, management interview and employee interview that no subcontracting or homeworking was used by the factory. All processes were finished within the factory.

Evidence examined:

1. Production records
2. Factory tour
3. Management interview and worker interview.

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 homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
No homemaker was used by the facility's suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
All manufacturing processes could be completed in the facility and no sub-contracting was used.

[← Code area 8](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

[← Code area 8.A](#)

[Code area 9 →](#)

Audit company:
TUV Rheinland (TUEV Rheinland)

Audit reference:
ZAA600162181

Start Date:
2025-10-16

End Date:
2025-10-17

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 Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on harsh or inhumane treatment, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to
validate this code section**

Current Systems:

1. The factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
2. The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past.
3. There is an internal process for grievance, which is an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.
4. The duties of security guards were to protect safety of factory's property, to regularized entrance/exit of goods/vehicles/ employees/ visitors.

Evidence examined:

1. The relevant policy on prevention of harassment and abuse.
2. Internal grievance procedure documentation
3. Training records
4. Worker interview and management interview

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? Suggestion box

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	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	Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on environment protection, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, had good awareness on environment protection and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: SIR

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Future risks may occur if the refresher training is not conducted regularly.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

1. The facility had written environmental policy.
2. There was a complete system in place to monitor client's environmental standards/code requirements.
- 2.Environmental Impact Assessment (EIA) for construction project, Environmental Impact Assessment (EIA) approval for construction project, environmental protection acceptance checks report for completed construction project and pollution discharge registration were provided.
4. The facility conducted the training for all employees on environmental impact.
- 5.The facility had not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.
6. One Manager was appointed for environment issue onsite.

Details:

- 1.Environmental policy
- 2.Training on the avoidance of environmental impact.
- 3.A comprehensive and tested emergency plan to mitigate environmental impact in case of incidents.
- 4.EIA documents and pollution discharge registration.
- 5.Employee and management interview.
- 6.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?

No valid environmental or energy management certificates obtained by the facility

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

[← Code area 10.A](#)

[Code area 10.B →](#)

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>Current systems:</p> <ol style="list-style-type: none"> 1.The facility had established written environmental policy. 2.The required environmental certificates: Environmental Impact Assessment (EIA) for construction project, Environmental Impact Assessment (EIA) approval for construction project, environmental protection acceptance checks report for completed construction project, pollution discharge registration was obtained. 3.The facility had collected the document of legal requirement and client's requirement on environment. 4.The facility had established an environmental policy, covering their environmental impact, and it was communicated to all appropriate parties, including its own suppliers. 5.The facility had recorded the use and discharge of natural resources e.g. energy use, water use. 6.The facility had established one set of environmental management system documentation. 7.One manager was appointed as environment specialist for co-ordinating the site's efforts to improve environmental performance. 8.The facility had identified the significant environmental impact of their site and its processes. <p>Details:</p> <ol style="list-style-type: none"> 1.Environmental policy and documents 2.Energy bills and water bills 3.Environment risk assessment records 4.Employee and management interview. 5.Site tour 		

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?	Responsible use and management of water Switching to renewable energy sources Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The facility had established a comprehensive system to collect, manage, and ensure compliance with environmental and chemical regulations in 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) Yes, to increase low-carbon energy consumption or production
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 Water consumption and discharge: the facility has set the reduction target by 5% in 5 years (2024-2028). Energy: the facility has set the reduction target by 5% in 5 years (2024-2028).
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

[← Code area 10.B](#)

[Code area 10.C →](#)

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	180,000	150,000
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details) No renewable energy used.	Other (provide details) No renewable energy used.
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	No	No
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)	1,453	955
Water discharged	local water authority	local water authority
Water volume discharged (m3)	0	0

[← Code area 10.B](#)

[Code area 10.C →](#)

Water volume recycled (m3)	1,162	764
Total waste produced (mt)	280	260
Total hazardous waste produced (mt)	4	3
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	280	260
Total product produced (mt)	2,000	1,800

[← Code area 10.B](#)

[Code area 10.C →](#)

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

[← Code area 10.B](#)

Management systems

Explanation for management systems grades

1. Policies and Procedures: R

Factory had established documented policy and procedures on business ethics, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with in the Base Code Area now and over time through regular review.

2. Resources: R

There was a responsible person available for ensuring implementation of site policies, had good awareness on business ethics was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time.

3. Training and communication: R

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. According to management and workers interview, they knew well about the business ethics. Due to effective assessment of understanding of those receiving training and/ or communications, factory can ensure a high level of efficacy.

4. Monitoring: R

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 10.B](#)

Systems and evidence examined to validate this code section

Current systems:

1. One manager was designated to be responsible for implementing standards concerning Business Ethics.
2. Training for relevant staff on taking action to Business Ethics issue had been reviewed.
3. The site had received and read the Business Ethics policy of the auditor/audit company.
4. There was a system in place to monitor end client's Business Ethics standards/code requirements.

Details:

1. Training records on business ethics including Bribery and Corruption.
2. Employee handbook
3. Records from anonymous suggestion scrip.

[← Code area 10.B](#)

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

No such certificate was obtained.

[← Code area 10.C](#)

Attachments



[Signed CAP-
ZAA600162181.pdf](#)



[Social Audit_Photo record-
ZAA600162181.pdf](#)