
Auditee :	Aiven On Stationery Co., Ltd.
Audit Date From :	28/02/2019
Audit Date To :	28/02/2019
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	TUEV Rheinland
Auditor's Name(s) :	Jerry Chen(Lead)
Auditing Branch (if applicable) :	TUV Rheinland China



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

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

Main Auditee Information

Name of producer :	Aiven On Stationery Co., Ltd.		
DBID number :	24400		
Audit ID :	144372		
Address :	No.16, JIN LONG ROAD, TAO YUAN DISTRICT, NINGHAI NINGBO		
Province :	Zhejiang	Country :	China
Management Representative :	Jiaona Zheng		
Contact person:	Weiyang Song	Sector :	Non-Food
Industry Type :	Accessories	Product group :	other accessories (please specify)
Product Type :	Fold back clip		

Audit Details

Audit Range :	<input type="checkbox"/> Full Audit	<input checked="" type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input checked="" type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 28/02/2020	

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

Executive summary of audit report

Aiven On Stationery Co., Ltd. (爱文易成文具有限公司) was located at No.16, JIN LONG ROAD, TAO YUAN DISTRICT, NINGHAI, NINGBO, ZHEJIANG, CHINA (中国浙江省宁波市宁海县桃源街道金龙路16号) and established on 26 December 2001. There were totally 9 buildings in the plant, all these buildings were owned by the auditee, the total area used by the auditee was around 32542 square meters and no dormitory was provided to employees. #1 to #3 building were flat production buildings which were used as printing workshop, paint-spraying workshop and blackening workshop. #4 building was a 3-storey production building with the first floor used as warehouse, the second floor used as automatic workshop and the third floor used as packing workshop. #5 building was a 4-storey floor building with the first floor used as injection workshop, the second floor used as packing workshop, the third floor used as warehouse and mold-processing area, the fourth floor used as semi-finished product warehouse. #6 building was a 3-storey building with the first floor as injection workshop, the second and third floor used as packing workshop. #7 building (totally 4 floors) was used as office area. #9 building was a 2-storey building (under construction during previous audit) with the first floor used as punching workshop and the 2nd floor used as electroplating workshop. The second floor of #8 building (totally 4 floors) was used as canteen and kitchen, other floors were leased to another facility which was specialized in manufacturing stainless boards as showroom and warehouse, and no production activity was conducted by the facility. The building areas of the auditee was separated from the other facility and no production workers were shared. Moreover, leasing contracts and business licenses of both facilities were provided for review, all these documents were valid, and there was no business relationship between them. Thus, the other facility in the plant was not included in audit scope.

The facility was specialized in the manufacture of fold back clip. Main production activities injection, punching, automatic-processing, heat-treatment, electroplating, blackening, paint-spraying, printing and packing. The hardware materials, chemicals and packaging materials were purchased from suppliers, no production process was subcontracted to outside. Moreover, there was no obvious peak season or low season in the facility. Management staff and production workers were directly hired by the facility, supporting staff, including 6 security guards and 9 chefs were outsourced from Ninghai County Security Guards service Co., Ltd and an individual respectively, no part time workers or temporary workers were used.

It was a semi-announced follow audit. The facility was cooperative and active throughout the whole audit, all the requested documents were provided in a timely manner, full access to facility walk-through and employee interview were granted, and photo-taking of necessary evidences for the audit were permitted. During the closing meeting, the auditor communicated fully with facility representative on detected non-compliances, the facility representative were positive and committed to make continuous improvement according to amfori BSCI requirement.

Remark:
No agency labor was used by the auditee, no contractor permit/ license, agency labor contract or any kind of waivers were obtained by the auditee, no collective bargaining agreements were established by the auditee. Thus, all above mentioned documents were not applicable for this auditee. Moreover, PA 12 was not included in audit scope in that no non-compliance was detected in previous audit in this PA, thus environment protection related documents were not uploaded for current audit.

Ratings Summary



Auditee's background information			
Auditee's name :	Aiven On Stationery Co., Ltd.	Legal status :	Limited Company
Local Name :	爱文易成文具有限公司 (913302267342422366)	Year in which the auditee was founded :	2001
Address :	No.16, JIN LONG ROAD, TAO YUAN DISTRICT, NINGHAI	Contact person (please select) :	Weiyan Song
Province :	Zhejiang	Contact's Email :	Hr6@aiven.com
City :	NINGBO	Auditee's official language(s) for written communications :	Chinese
Region :	North East Asia	Other relevant languages for the auditee :	None
Country :	China	Website of auditee (if applicable) :	http://www.aiven.com
GPS coordinates :	N29°19'56", E121°25'21"	Total turnover (in Euros) :	26320000.00
Sector :	Non-Food	Of which exports % :	90.00
Industry :	Accessories	Of which domestic market % :	10.00
If other, please specify :		Production volume :	1,036,800,000 pieces/year
Product Group :	other accessories (please specify)	Production cost calculation :	Yes
If other, please specify :	Fold back clip	Lost time injury calculation cost :	Yes
Product Type :	Fold back clip		

Auditee's employment structure at the time of the audit		
Total number of workers :	449	Total number of workers in the production unit to be monitored (if applicable) :
		0
	MALE WORKERS	FEMALE WORKERS
Permanent workers	49	82
Temporary workers	124	194
In management positions	9	3
Apprentices	0	0
On probation	0	0
With disabilities	0	0
Migrants (national citizens)	101	157
Migrants (foreign citizens)	0	0
Workers on the permanent payroll	162	272
Production based workers	0	0
With shifts at night	28	16
Unionised	0	0
Pregnant	-	0
On maternity leave	-	0

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: D

Deadline date:27/02/2020

GOOD PRACTICES:

The facility finished stakeholder mapping before the audit, related information was provided for review during the audit. 工厂在审核前完成了利益相关方分析表, 相关信息在审核过程中提供了查看。

AREAS OF IMPROVEMENT:

The facility had established completed social procedures based on amfori BSCI Code of Conduct and relevant laws, for example, the procedures on hiring, dealing with grievances, no child labor, no forced labor, training for workers, fair remuneration, decent working hours, ethical business behaviour and etc. were established. Jiaona Zheng/ Vice HR and Admin Manager was assigned as management representative and took whole charge of amfori BSCI affairs in the facility. The commitment to comply with the amfori BSCI social requirements was signed by management staff on sensitive positions, relevant trainings were conducted regularly. The facility conducted internal audit and management review regularly to check the effectiveness of the management system, last internal audit and management review was conducted on 8 January 2019 and 16 January 2019 respectively. Meanwhile, the facility had established systems to monitor its business partners' social insurance and second-part audits were conducted regularly on main business partners, the facility also signed social responsibility commitment letter, amfori BSCI CoC and TOI with them. However, gaps had been identified in implementation. 1.3-Previous non-compliance partially corrected. Per provided time records of security guards and chefs, security guards were provided with 7th days of rest. Moreover, the time records of security guards and chefs contained specific time-in and time-out, and were signed by each of them for verification each month.

工厂依据amfori BSCI行为准则以及相关法规建立了完整的社会责任程序, 例如, 招聘、申诉处理、不使用童工、不使用强迫劳动、员工培训、公平报酬、体面劳动时间、商业道德行为等程序已建立。郑妍娜/人事行政副经理被任命为管理者代表, 统筹整个工厂的amfori BSCI事务。管理人员签署了amfori BSCI社会责任承诺书, 相关培训定期举行。工厂定期开展内审和管理评审来检验管理体系的有效性, 上次内审和管理评审分别是在2019年1月8日和2019年1月16日举行的。同时, 工厂建立了系统去管控其商业合作伙伴的社会责任的执行情况, 并对其主要商业合作伙伴进行了定期的二方审核。并和他们签署了社会责任承诺书, amfori BSCI行为准则及商业伙伴专用实施条款。然而, 工厂在实施中仍存在差距。1.3-上次部分已改善。根据提供的保安和厨工的工时记录, 保安的第七天休息得到了保证。并且保安和厨工的工时记录都包含了准确的上下班时间, 并且每个月由他们签字确认。

1.1 - The facility had not established effective management system to fully implement the amfori BSCI Code of conduct and legal requirements. As per interview with the BSCI representative, the facility did not monitor the implementation of deviations detected in internal audit, such as excessive overtime working hours and no effective measures taken on occupational health hazard factors prevention and treatment. As per reported by workers and worker representatives, the auditee had provided training regarding amfori BSCI to them, however, they were not clear about the detailed requirement on implementation, such as the requirement on overtime working hours control and occupational health examination. Per interview with amfori BSCI management representative, current operation in the facility was based on former experience and reference from peers, rather than completely based on amfori BSCI requirement. Moreover, it was difficult to comply with all procedures perfectly due to various reasons, such as cost control, production plan being adjusted according to orders and so on.

工厂未能建立有效的管理体系来执行amfori BSCI行为准则和相关法规要求。根据管理人员访谈, 发现工厂未对内审所发现的问题的执行情况进行监控, 比如加班超时以及没有采取有效的职业病危害防治措施等。通过员工和员工代表访谈, 工厂提供了amfori BSCI相关的培训, 但是, 他们不清楚在执行过程中的具体要求, 例如加班时间控制以及职业病体检方面的要求。根据amfori管理者代表访谈, 工厂目前的运作主要来自之前的经验和同行借鉴, 而不是完全基于amfori BSCI的要求。并且由于很多原因, 如成本控制, 生产计划根据订单调整等, 要完全符合所有程序非常困难。

1.3 - The facility outsourced security service and catering service to one security Service Company and one catering service company. However, the facility did not adequately monitor the social performance for the two service providers. 1. Excessive monthly overtime working hours were detected for all 9 chefs and 6 security guards. According to the time records of chefs and security guards in June 2018, September 2018 and January 2019, monthly overtime working hours exceeding 36 hours were detected for all 9 chefs in June 2018 with the maximum up to 40 hours, monthly overtime working hours exceeding 36 hours were detected for all 6 security guards June 2018, September 2018 and January 2019 with the maximum up to 140 hours, 132 hours and 128 hours respectively. 2.Social insurance status for employees can not be verified. Social insurance receipt for employees in the service companies were not provided for review.According the facility management, all of them were provided with social insurance. As employees do not bring social insurance cards, social insurance evidence can not provide for review.

工厂将保安服务和餐厅服务外包。但是工厂没有充分监管这两家外包商社会责任表现情况。1.所有9名厨工和6名保安月加班超时。根据厨工和保安2018年6月, 2018年9月和2019年1月的考勤, 所有9名厨工在2018年6月的月加班超时, 最大月加班时间达到40小时; 所有6名保安在2018年6月, 2018年9月和2019年1月的月加班超时, 最大月加班时间分别达到140小时, 132小时和128小时。2.外包员工社保参保情况无法完全评估。外包员工社会保险的发票没有提供查看。工厂解释说所有厨工保安都有参加社会保险, 但是因为员工上班没有带社保卡, 因此不能提供参保证据查看。

1.4 - The facility had established production cost calculation procedure but failed to provide the calculation related records, the factory did not arrange effective workforce capacity plan to meet the expectations of the delivery order, thus, workers' monthly overtime hours exceeded 36 hours.

工厂建立了成本核算的程序文件, 但是没有提供相关的记录, 工厂未安排有效的产能计划以满足订单交付的要求, 因此导致了员工月加班超过36小时。

Remarks from Auditee:

Accept

Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: D

Deadline date:20/06/2018

Good practices

N/A

Areas of improvement

The facility established a set of management system to implement the Amfori BSCI code of conduct. The facility established procedure to collect and update relevant law on labor, EHS and ethics according to the Amfori BSCI Code of Conduct. Jiaona Zheng/Vice Manager was appointed as Amfori BSCI management representative. There were periodical internal audit and management review procedure set in the auditee. The facility conducted internal audit and management review was conducted at the beginning of each year. Social compliance commitment letters were signed by some major suppliers and annual social performance assessment to major suppliers were conducted. However, gaps have been identified in implementation.

工厂建立了一套管理体系来确保工厂遵守Amfori BSCI行为准则。工厂根据Amfori BSCI的行为准则建立了收集和更新劳工、道德、健康安全和环境的法律法规。此外, 工厂任命郑妍娜为工厂的Amfori BSCI管理者代表。工厂有建立定期开展内审和管理评审的程序文件。工厂在每年年初开展内审和管理评审。工厂有要求一些主要供应商签订社会责任承诺书, 同时工厂有对一些主要供应商开展年度社会责任评审。然而执行过程中仍然有发现不符合项。

1.1 - The facility set up some management procedures to implement the AMFORI BSCI Code of Conduct, but not all policies or procedures were properly implemented, for instance, overtime working hours were systematically above the legal limits. According to the facility management, due to the local law was so strict, they need to arrange overtime work to ensure workers' wage was higher otherwise they can only get basic wage which was not enough to keep workers.

<p>工厂建立了确保AMFORI BSCI有效实施的管理制度,但是不是所有制度都得以有效实施,比如工厂工作时间系统性超时。工厂管理层解释说,因为国家法律要求比较严格,他们需要安排员工加班确保员工工资高一点不然员工只拿底薪无法留住员工。</p> <p>1.3 - The facility outsourced security service and catering service to one security Service Company and one catering service company. However, the facility did not adequately monitor the social performance for the two service providers. 1. Excessive monthly overtime working hours were detected for all 6 security guards and 10 canteen workers. According to the time records from November, 2017, January and February 2018 for canteen workers, monthly overtime working hours exceeding 36 hours were detected for all 10 workers in November 2017 with the maximum up to 40 hours. According to the time records from December 2017, January and February 2018 for security guards, monthly overtime working hours exceeding 36 hours were detected for all 6 security guards with the maximum up to 80 hours. 2. Seventh day rest was not guaranteed for all 6 security guards in December 2017, January and February 2018 with the maximum consecutive working days up to 31 days. 3. The time records provided for security guards and canteen workers were not accurate, without detailed time-ins or time-outs. As per the time records for canteen workers, working schedule were reflected, "v" were marked to stand for 8 hour's work and employee signed with confirmation each month for the time records. As per the time records for security guards, "f" were marked to present 8 hour's work for early shift, middle shift or night shift. No employee signatures were reflected. 4. Social insurance status for employees can not be verified. Social insurance receipt for employees in the service companies were not provided for review. According to the facility management, all of them were provided with social insurance. As employees do not bring social insurance cards, social insurance evidence can not provide for review.</p> <p>工厂将保安服务和餐厅服务外包。但是工厂没有充分监管这两家外包商社会责任表现情况。1.所有6名保安和10名厨工月加班超时。根据厨工2017年11月, 2018年1月和2月份的考勤, 所有10名厨工2017年11月份月加班超时最大加班时间为40小时。根据2017年12月, 2018年1月和2月份的考勤, 所有6名保安2017年12月, 2018年1月和2月份月加班超时, 对打月加班时间达到80小时。2. 所有6名保安2017年12月, 2018年1月和2月份, 第七天休息没有保障, 最大连续工作时间达到31天。3.所有保安和厨工的考勤不准确, 没有准确的上下班时间。厨工考勤显示了排班时间, 用"v"代替8小时出勤, 员工每月签名确认了考勤。保安的考勤仅用"f"代替8小时的早班或者中班, 晚班。也没有员工签名确认。4.外包员工社保参保情况无法完全评估。外包员工社会保险的发票没有提供查看。工厂解释说所有厨工保安都有参加社会保险, 但是因为员工上班没有带社保卡, 因此不能提供参保证据查看。</p> <p>1.4 - The facility did not have a good capacity planning to meet the expectations of the delivery order which lead to excessive overtime work for employees in the past 12 months. The costs of production and delivery times were not calculated realistically.</p> <p>工厂没有一个完善的产能计划去完成预期的订单交货以致于员工在过去12个月有超时加班。工厂没有实际低生产成本, 和没有交付时间的计算。</p>
<p>Remarks from Auditee</p>

Performance Area 2 : Workers Involvement and Protection	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:27/08/2019
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>Regular meeting on improving working conditions was with attendance of management and workers and the meeting records were provided to review. Labor union was established in the facility and workers could join in freely. Moreover, worker representatives were selected by workers through public voting. Training regarding employees' rights and responsibilities were provided for workers and they understood their rights and responsibilities well. During the onsite tour, it was noted that amfori BSCI Code of Conduct was posted in the workshops and trainings on amfori BSCI Code of Conduct were arranged for the management, worker representative and production employees. In addition, the factory established an effective grievance mechanism and conducted regular survey on the satisfaction of grievance procedure. In one way, employees could transfer suggestions to the senior manager directly. In the other way, the employees could transfer their requirements through the grievance mechanism or suggestion box. However, gaps had been identified in implementation.</p> <p>管理层和员工就改善员工工作条件定期进行会议, 并提供了会议记录。工厂成立了工会, 员工可以自由加入工会, 并且员工通过公开投票, 选举产生员工代表。工厂为员工进行了权利和义务的培训, 员工对自己的权利和义务比较了解。现场查看过程中, 发现工厂车间里张贴了amfori BSCI行为守则, 管理层、员工代表和生产员工也进行了amfori BSCI行为守则的培训。另外, 工厂为员工建立了一个有效的申诉机制并定期进行满意度调查。一方面, 员工可以直接与高管进行意见沟通, 另一方面, 员工也可以通过申诉渠道或者意见箱来表达要求。然而, 工厂在实施中仍存在差距。</p> <p>2.4 - The amfori BSCI Code of Conduct and poster was posted onsite, and relevant training was provided to workers regularly, however, per worker interview, 15 out of 24 interviewed workers were still not quite aware of the amfori BSCI standards, such as the the requirement on overtime working hour control and occupational health examination etc. 工厂已经在现场张贴了amfori BSCI的行为准则, 且定期给员工提供相关培训, 然而, 根据员工访谈, 24名受访员工中有15名员工仍然不是很清楚amfori BSCI标准, 例如加班时间控制以及职业病体检方面的要求等。</p>	
Remarks from Auditee: Accept	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:20/06/2018
Good practices: None	
Areas of improvement <p>Based on the Amfori BSCI code of conduct, the facility set up procedure and policy on worker involvement and protection. Besides, the auditee provided trainings regarding grievance mechanism to all workers. Employees can report grievance through suggestion box, or email anonymously. With regard to the reported cases, the HR department were authorized to handle the issues and no retaliation reported. Relevant documents were maintained and provided for review. There was one Trade Union in the facility. Three worker representattives were elected and communication meeting between management and the worker representative were provided for review. However, gaps have been identified in implementation. 工厂依据AmforiBSCI的行为准则建立了员工参与和保护的方针政策和程序文件。此外, 工厂为所有员工提供了关于申诉机制方面培训。同时员工可以通过意见箱和邮箱来匿名申诉。对于所有上报的案例, 工厂人事部门会负责后续事宜调查和处理, 举报员工不会被打击报复。相关文件都有保留和提供查看。工厂有工会。工厂有选举出3名员工代表。工厂管理层和员工代表的开会记录有提供查看。然后执行过程中仍然有发现不符合项。</p> <p>2.4 - Amfori BSCI Code of Conduct was posted on the bulletin board. Amfori BSCI standard training was provided to employees and relevant training records were provided for review. However, all employees reported that they were not aware of Amfori BSCI Code of Conduct. The interviewed workers confirmed trainings on Amfori BSCI, .They knew some basic requirements on wage and benefits and no child labor policy. But they did not understand the content of the code of conduct such as anti-brinery, environment protection and so on. Amfori BSCI行为准则粘贴于公告栏且厂内为员工提供了Amfori BSCI行为准则培训。相关培训记录有提供查看。但是, 全部受访员工均汇报不了解Amfori BSCI行为准则标准。访谈员工表示工厂有给他们培训Amfori BSCI, 他们知道一些基本工资福利和禁止招聘童工方面政策, 但是其他问题例如禁止腐败和环境保护员工表示不理解这些要求。</p>	
Remarks from Auditee	

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 3.1-3.4 was not rated during the current assessment. 本次审核为复审, 3.1至3.4问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The auditee did not restrict the rights of free association and bargaining of all workers. No collective bargain agreement was concluded between the factory and workers, but the factory did not prevent workers from bargaining for the agreement. Based on statement of worker representative, the worker representatives were not discriminated by the factory. They had access to workers and workplace freely. 工厂不限制工人自由结社和集体谈判的权利。工厂和员工无集体谈判协议, 但工厂也未阻止员工有意愿的时候和工厂谈判。根据员工代表的访谈员工代表不会被歧视, 员工代表可以随时进入车间和员工沟通。	
Remarks from Auditee	
Performance Area 4 : No Discrimination	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 4.1-4.3 was not rated during the current assessment. 本次审核为复审, 4.1至4.3问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The factory made one policy on anti-discrimination. The policy defined that the factory would not discriminate workers by race, gender and ages etc. And according to interview statement with workers, workers could use the grievance system through suggestion boxes or telling to worker representatives once workers' right was infringed. Furthermore, the policy on discipline measures made by the factory was in line with legal requirement. All these processes could be verified by document review and interview. 工厂制定了反歧视的政策, 反歧视政策中表明工厂不会因为种族, 性别, 年龄等原因对员工区别对待。并且依照员工访谈, 若员工的权利受到任何侵害, 员工可以通过意见箱或和员工代表反馈的形式进行投诉。而且, 通过查看工厂的惩戒措施程序, 其描述的措施均符合法规和BSCI要求。	
Remarks from Auditee	

Performance Area 5 : Fair Remuneration	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: The relevant data was collected, calculated and provided for review during the audit. 企业收集、计算了相关数据, 并在审核期间提供查阅。	
AREAS OF IMPROVEMENT: The facility had established salary and benefit policy according to amfori BSCI Code and local law. The facility collected the local legal minimum wage data from local government websites periodically. Legal minimum wage was RMB 1660/month and equal to RMB 9.54 per hour since 1 December 2017. Payroll records from March 2018 to January 2019 were provided for review. According to provided payroll records, worker interview and management interview, the salary and benefits in the facility was as follow: 1) The payment cycle was natural month. Wage was paid around 15 of the following month in cash. 2)The wage was made up of basic wage(no less than RMB 9.77 per hour) and overtime compensation. 3) No deduction was used for disciplinary measure, only the individual tax and social insurance fee were deducted from the wage. 4) The paid annual leave was provided to workers according to legal standard. 5) All employees entitled to participate in social insurance were provided with five kinds of social insurance, commercial injury insurance was provided to retired workers and new hired workers. 工厂依据amfori BSCI行为准则和当地法规建立了薪资福利制度, 工厂定期从当地政府网站收集当地的最低工资数据, 当地的最低工资标准在2017年12月1日之后为每月人民币1660元等同于每小时人民币9.54元。工厂提供了2018年3月至2019年1月的工资记录供审核。基于提供的工资记录, 员工访谈及管理层访谈, 工厂的薪资待遇如下: 1) 工资的支付周期为自然月。工资在次月15日左右以现金形式发放。2) 工资由基本工资(不低于人民币9.77元每小时)和加班费组成。3) 不存在作为惩罚措施的扣款, 只有个人所得税和社保费用从工资中扣除。4) 工厂依据法规要求支付了工人带薪年假。5) 工厂给所有符合社保参保条件的员工提供了五项社会保险, 给退休员工和新员工提供了商业意外险。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u> The facility established policy and procedure on wage and benefits and laws and regulations related the wages and benefits in China were collected and updated regularly. The policy was communicated to all the employees and financial staff. Wage was paid by hourly rate with at least RMB9.77 which was higher than the local minimum wage standard of RMB9.54 per hour. The total wage for employees were about 2500 -3000 per month which was higher than the living wage.And the overtime premium were 150%, 200% and 300% of normal wage for overtime work on weekdays, weekends and statutory holidays respectively. The wages were paid by cash at the 15th of the following month and pay slips were provided to the workers. The facility provided payroll records from March 2017 to February 2018 for review. During the audit, 21 samples was reviewed. Mandatory benefits such as the paid annual leaves and social insurance were provided for workers. No disciplinary deduction was used by the facility management. As per the social insurance of March 2018, totally 431 employees excluding 20 retired and 31 new hires were intitled to be covered with five types of social insurance. All entitled employees were provided with five types of scial insurance. The rest employees including 20 retired employees and 31 new hires who joined the facility with no more than 1 month were covered with commerical insurance.The valid period of the commerical insurance was from October 30,2017 to October 17,2018. 工厂建立了工资福利方面的政策和程序, 同时收集了中国关于工资福利方面的法律法规并且定期更新这些法规。并且将此政策传达给了厂内的员工和财务人员。工厂员工实行时薪制, 底薪至少9.57元每小时, 高于当地最低工资标准9.54每小时。员工每月拿到的工资总额为2500元至3000元, 高于当地生活工资标准。同时工厂会给予平时加班的员工提供1.5倍的加班费, 周末加班的员工2倍的加班费, 法定节假日加班3倍加班费。工资都以现金的形式发放。工厂会在每月15日支付上一月的工资。最近工资发放月是2018年2月。工厂提供了2017年3月至2018年2月的工资, 审核期间抽取了21个样本作为评估依据。工厂向员工提供了法律要求的福利, 如带薪年假和社保。工厂没有采用纪律性罚款来约束员工。工厂一共482名员工除去20名退休员工和31名新入厂员工, 2018年3月份, 工厂一共为431名员工提供了五种社会保险。其他20名退休返聘的和入厂不满一个月的31员工工厂都有给这些员工提供商业意外保险。商业保险的有效期为2017年10月30日至2018年10月17日	
Remarks from Auditee	

Performance Area 6 : Decent Working Hours

1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: D

Deadline date:27/02/2020

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The facility had established working hour policy according to amfori BSCI code and legal regulations. The normal working day was 8 hours per day and 5 days per week, overtime working hours should be controlled within 3 hours a day and 36 hours a month. Injection workers, punching workers and heat-treatment workers worked in 2 shifts: 7:30~15:30 and 15:30~23:30. All the other employees worked in one shift: 7:30~16:30 with a lunch break from 11:30 to 12:30, regular overtime was conducted from 17:30-19:30. The facility used IC card to track employees' working hours. As per sampled time records, the maximum overtime hour was 2 hours per day, 10 hours per week, 48 hours per month. Saturday was arranged as overtime. No Sunday or holiday work was detected. The workers stated that they were willing to conduct overtime work to earn more money. However, gaps had been identified in implementation. (Remark: Security guard worked in 2 shifts: 6:00~18:00 and 18:00~6:00; chef worked in 1 shift: 7:30~17:30 with a lunch break from 12:30 to 14:30.)

工厂按照amfori BSCI准则和法律法规要求建立了工时政策。正常工作时间为每天8小时,每周5天,日加班不得超过3小时,月加班不得超过36小时。注塑、冲压、和热处理员工有2个班次:7:30~15:30和15:30~23:30,其他所有生产员工以一个班次上班:7:30~16:30,其中包含从11:30到12:30的午餐休息时间,平时加班从17:30~19:30。工厂使用IC卡来记录员工的工作时间。根据抽样的考勤记录,最大的加班时间是每天2小时,每周10小时,每月48小时。周六被安排为加班。没有发现周日加班和假日加班。员工声称乐意加班来赚取更多的工资。然而,工厂在实施中仍存在差距。(备注:保安有2个班次:6:00~18:00和18:00~6:00,厨工一个班次:7:30~17:30,其中包含从12:30到14:30的午餐休息时间。)

6.2 - Time records from 1 March 2018 to the audit day was provided for review and randomly selected 24 sampled workers' time records from June 2018, September 2018 and January 2019 were reviewed in current audit, it was noted that monthly overtime hours exceeded 36 hours was conducted by workers in June 2018 and September 2018, the maximum monthly overtime hours reached 48 hours in both months, no worker's monthly overtime hours exceeded 36 hours in January 2019 and the maximum was 30 hours. It was noted that the computerized attendance system did not have the capability to flag excessive overtime hours. Based on document review, the factory established working hour control procedure, but was not implemented effectively by workshop. As reported by workshop supervisor, sometimes, the workshop had to conduct overtime work to finish the order in time. The factory tried to control the monthly overtime within 36 hours, but the orders need to be finished in time. As reported by workers, they knew the monthly overtime hours should not exceed 36 hours as per local regulation, but they were still willing to conduct overtime work, for they could earn more money. (Reference law: Article 41, PRC Labor Law.) Remark: The maximum total overtime hour from 1 February 2019 to the audit day was 8 hours.

自2018年3月1日至审核当天的考勤提供查看。此次审核在2018年6月、2018年9月和2019年1月中随机抽取了24名抽样员工的考勤来查看,员工在2018年6月和2018年9月存在月加班超过36小时的情况,最大月加班工时数均为48小时。2019年1月所有员工的月加班都不超过36小时,最高为30小时。考勤系统没有加班超时的警示提醒功能。根据文件审核,工厂建立了工时控制程序,但是车间未能有效落实。根据车间主管汇报,有时候,车间不得不进行超时加班来按时完成订单。工厂尽量将加班时间控制在36小时以内,但是订单也需要按时完成。根据员工汇报,他们知道根据当地法规月加班不应超出36小时,但是他们仍然乐意进行加班工作,因为可以获得更多报酬。(参考法规:中华人民共和国劳动法第41条)备注:自2019年2月1日至审核当天的最大总加班时数为8小时。

Remarks from Auditee:

Accept

Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: D

Deadline date:20/06/2018

Good practices

Areas of improvement

The facility set a policy and procedure on working hours and controlled working hours according to local law requirements and Amfori BSCI Code requirements. There were no apparent peak or non-peak seasons in the facility. The regular working days were 8 hours from Monday to Friday. All employees used IC cards to track working hours. There were two shifts in the facility. All injection, punching and heat treatment workers conducted two shifts with the working schedule as 7:30am-3:30pm; 3:30pm to 11:30pm. The rest production employees and office staff conducted one shift with the established working time as 7:30am-11:30am; 12:30pm-4:30pm. Regular overtime hours were conducted from 5:30pm to 7:30pm, once per week. Saturday overtime work was conducted for 8 hours, 4 to 5 times per month. No Sunday work was conducted for all employees. Overtime work was conducted on a voluntary basis. Time records from March 2017 to March 19, 2018(the assessment date) were provided for review and 21 samples were selected as primary samples. The maximum daily working hour was 10 hours, the maximum weekly working hours was 50 hours and the maximum monthly overtime was 48 hours. The longest consecutively working days was 6 days. All this processes and implementation can be verified by interview and document review. However, gaps of overtime hours were identified in implementation.

工厂制定了工时政策和程序,并且根据当地法规和Amfori BSCI行为准则控制工作时间。工厂没有明显淡旺季。工厂正班工作时间从周一到周五,员工每天上班8小时。员工用IC卡记录工作时间。工厂有2个班次。注塑、冲压和热处理车间员工实行两班制工作时间为7:30am-3:30pm; 3:30pm to 11:30pm。其他车间员工和办公室人员实行一班制,工作时间为7:30am-11:30am; 12:30pm-4:30pm。工作日加班一般从5:30pm -7:30pm,每周一次。周六加班8小时,每月4到5次。星期日不会安排加班。员工加班都是自愿的。2017年3月份至2018年3月19日(审核当天)的考勤有提供查看,审核期间抽取了21个样本作为评估依据。目前工厂记录中每天最大出勤10小时,每周最大周工时50小时,月加班最大为48小时。最长连续工作天数为6天。以上均已从员工访谈以及文件信息等方面进行核实。然而,工厂工作时间仍然存在不符合项。

6.2 - The time recording system in the facility did not place limitation on excessive overtime working hours. The payroll records of March 2017 to February 2018 and the working time records from March 2017 to the audit date(March 19,2018) provided by the facility, showed that monthly overtime hours exceeded 36 hours in most months. For three sampled months, monthly overtime working hours exceeding 36 hours were detected for 21 out of 21 employees in December 2017 and January 2018 with the maximum up to 48 and 40 hours respectively. The total overtime working hours for all 21 out of 21 employees in February 2018 were within 36 hours with the maximum to 20 hours. The maximum overtime working hours for sampled 21 employees from March 1, 2018 till the audit date (March 19, 2018) was 20 hours. According to the facility management, the overtime working hours were arranged only when they were certain that physical conditions for employees were good. Sometimes they need to conduct overtime work to the delivery. As per the interviewed employees, the working hours in the facility was conducted on a voluntary basis and the workload and time was acceptable to them. Reference law: PRC Labor Law article 41.

工厂考勤系统没有控制员工过度加班。根据工厂提供的2017年3月至2018年2月的工资以及2017年3月至审核当天(2018年3月19日)的考勤记录,员工在大多数月份加班超过法规要求。比如抽样三个月里,2017年12月和2018年1月份21名抽样员工中的21名均加班超过36小时,最大月加班时间达到48小时和40小时。2018年2月份所有抽样员工最大月加班时间为20小时没有超过法律要求。此外,抽样员工2018年3月1日至审核当天的总加班时间为20小时。工厂管理层解释到工厂在确保员工身体健康的前提下安排员工加班,但是有时候为了赶货期需要安排加班。受访的员工表示,员工都是自己自愿加班,加班时间和工作量都是可以接受的。参考法律法规:《中华人民共和国劳动法》第41条

Remarks from Auditee

Performance Area 7 : Occupational Health and Safety

1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A Deadline date:27/08/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The facility had established the health and safety management procedure. Xiwen Shi/ Production Manager was appointed as EHS representative to be responsible for the health and safety. The work injury records were provided to review and no injury happened during the past year. The risk assessment covered many aspect, such as danger resource, working position, pregnant workers, etc. Occupational health hazard factors existed in the working position like injection, punching, automatic-processing, heat-treatment, electroplating, blackening, paint-spraying, printing etc. The facility provided occupational health hazard factors monitoring report and provided on-job occupational health examination to related workers. Fire drill was provided to employees for twice per year, and the latest was on 10 August 2018. Employees knew how to use fire fighting equipment. One qualified electrician was hired and conducted regular check on electric appliances. Annual inspection report for special equipment were provided and there was certificated special equipment management personnel. Sufficient fire equipment were available throughout the working areas and were inspected monthly. Sufficient exits were available in each work floor and all emergency exits were installed with lighting safety exit signs and emergency lights. Evacuation plot plan with location of observer were posted in each work floor. First aid kits with kinds of medicine and tools were available for employees. 14 first aiders were trained and certified by local Red Cross on 4 March 2017 (valid for 3 years). In addition, the quick medical agreement to respond in case of trauma or serious illness happened was signed between the factory and Ninghai County Guanzhuang hospital. Also, employees can access the free drinking water at their will and valid drinking water testing report was provided to review. Privacy devices were available in the toilets. Free canteen was provided to workers, it was tidy, equipped with fire-fighting equipment and first aid kit. There was no dormitory or transport provided in the factory, therefore, 7.23 and 7.24 were rated as N/A. However, gaps had been identified in implementation. 7.1-Previous non-compliance partially corrected. On-job occupational health examination was provided to all workers exposed to occupational hazard factors. Related records were provided for review and it was also confirmed through worker interview. 7.3-Previous non-compliance corrected. The facility had conducted risk assessment on work positions, all the work positions were covered. 7.6-Previous non-compliance partially corrected. Occupational hazard factors notification had been posted in workshops with occupational hazard factors, including injection, punching, automatic-processing, heat-treatment, electroplating, blackening, paint-spraying, printing etc.

工厂建立了健康安全管理程序。石锡文/生产经理被任命为职业健康安全负责人，负责健康和安。工厂提供了工伤记录，过去一年没有发生工伤。风险评估涵盖多方面，如危险源、岗位和怀孕女工等。注塑、冲压、自动化、热处理、电镀、喷漆、黑化、印刷等岗位存在职业病危害。工厂提供了职业病危害因素监测报告，并且给相关员工提供了在岗职业病体检。消防演习每年两次，最近一次在2018年8月10日。员工表示他们都会使用灭火设备。工厂招聘了一名有资质电工定期对电气设备进行检查。工厂提供了特种设备的年检报告并且配备了有资质的操作人员。生产区域配备了足够的消防设施，每月进行检查。每个车间安全出口数量充足，并安装了灯光出口标示和应急灯。现场张贴了标有观察者位置的逃生平面图。工厂为员工配备了装有各种药品和工具的急救药箱。14名急救员在2017年3月4日(有效期3年)接受当地红十字会的培训取得相应的资格;同时工厂和宁海县冠庄医院签署了紧急救护协议以应对突发的伤害或严重疾病。同时，员工也可以在任何时候喝免费饮用水，工厂提供了有效的饮用水检测报告。厕所配备了隐私设施。工厂给员工提供了免费的餐厅，餐厅干净并且配备了消防设备以及急救药箱。工厂没有给员工提供宿舍和交通给员工。所以，7.23和7.24 不适用。然而，工厂在实施中仍存在差距。7.1-上次问题部分改善。工厂给所有接触职业病危害的员工提供了在岗职业病体检，相关记录在此次审核提供了查看，并且在员工访谈得到确认。7.3-上次问题改善。工厂已经进行了岗位风险评估，所有工作岗位都有涵盖。7.6-上次问题部分改善。工厂在所有存在职业病危害的岗位张贴了职业病危害告示，包括注塑、冲压、自动化、热处理、电镀、喷漆、黑化、印刷等车间。

7.1 - Through site observation and management interview, the occupational hazard factors of noise, dust and hazardous chemicals existed in production workshop. However, only on-job occupational health examination was provided to these workers, but no pre-job occupational health examination was provided. Moreover, no post-job or job-transfer occupational health examination was provided to workers that were previously working in this position. Per management interview and provided documents, no workers transferred jobs, but 27 workers were resigned. (Reference law: PRC Law of Prevention and Control of Occupational Diseases article 35.)

根据现场观察和管理人员访谈，工厂生产车间存在噪声、粉尘和化学品等粉尘职业病危害。但是工厂只为这些员工提供了在岗职业病体检，而没有提供岗前职业病体检。也没有为之前在该岗位工作的员工提供离职和转岗职业病体检。根据管理人员访谈和所提供的文件，过去12个月没有员工转岗，但是有27名员工离职。(参考法律法规:《中华人民共和国职业病防治法》第35条)

7.6 - Per site observation, one printing worker was not wearing provided rubber gloves and goggles during working hours. The worker reported that proper and sufficient PPEs were provided free of charge, but wearing these PPEs was not comfortable, thus the worker sometimes did not wear them. (Reference law: PRC Safety Manufacturing Law article 42)

根据现场观察，1名印刷员工工作期间没有佩戴所提供的橡胶手套和护目镜。该员工反应工厂提供了合适并且足量的劳保用品，但是佩戴这些劳保用品不舒服，所以有的时候没有佩戴。(参考法律法规:《中华人民共和国安全生产法》第42条)

7.17 - Per site observation, the production line used in the heat-treatment workshop was not installed with pulley guard. (Reference law: General rules of design on health and safety of production facility (GB5083-1999), Article 6.1.2)

根据现场观察，热处理车间使用的流水线没有安装皮带轮保护罩。(参考法律法规:《生产设备安全卫生设计总则》(GB5083-1999)第6.1.2条)

Remarks from Auditee:

Accept

Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A Deadline date:20/06/2018

Good practices

None

Areas of improvement

The facility established a written procedure on health and safety and collected relevant laws and regulations. The facility management had a good knowledge of the requirements. The facility established a health and safety Committee under the leadership of Juanjuan Zhang/HR Supervisor. Some of the health and safety risks such as transmitted or non-transmitted diseases were clearly identified and they took effective measures to prevent workers from having injuries. Employees were trained based on topics including safe operation, first aid, fire drills, chemical usage and so on. Chemicals such as caustic soda and paint were used in electroplating and paint spray processes. Chemicals were clearly marked and MSDS were available for all chemicals used. Secondary containments and eye wash sets were provided for chemicals used in workshop and stored in the chemical warehouse. Adequate first aid materials were available in the factory and Caifu Wang/Security Leader regularly inspected first aid supplies to ensure all of them were valid. Besides, employees can get access to clean drinkable water. The toilet and the workshop kept clean. Sufficient emergency exits are available on all work floors. All emergency exits are unlocked, unblocked and easily accessible. Adequate firefighting equipment including fire extinguishers, fire hydrants and fire alarms were provided on each work floor. All firefighting equipment are properly mounted, regularly inspected and clearly marked. Canteen was available in the facility. The canteen and kitchen was clean. Valid food

	<p>business license and health certificates for all 10 kitchen workers were provided for review. As no transportation was provided to employees and the employees went home by themselves, therefore, 7.23 was rated as N/A. 7.24 was rated as N/A because no dormitory were provided in the facility. However, gaps have been identified in implementation.</p> <p>工厂制定了健康安全方面的政策和程序, 收集了关于健康安全的法律与法规。工厂管理人员了解工厂所制定的程序。工厂成立了以张娟娟人事主管为领导的健康安全委员会。工厂有识别出一些健康安全的风向例如传染性疾病和非传染性疾病。同时工厂采取了有效措施防止员工发生工伤。工厂制定了处理以及记录工伤的程序。工厂对厂内的员工定期进行关于健康安全的培训, 包括安全操作, 急救培训, 消防演习和化学品使用。电镀和喷漆工序用到氢氧化钠和油漆等化学品。现场使用的化学品都清楚标识, 并且有MSDS张贴在车间。车间使用和储存的化学品都有配备二次容器和洗眼器。工厂配备了足够的药箱。王财富保安队长定期检查药箱并且保证所有的药品都在有效期内。员工在工厂工作期间可以喝到干净的饮用水。工厂内的厕所以及车间均保持良好的清洁度。所有车间配备了足够的安全出口, 所有安全出口出口都畅通。每个车间都配备了足够的消防设备包括灭火器, 消防栓和消防警铃。所有消防器材都有恰当摆放, 定期检查并且清楚标识。工厂有提供餐厅, 餐厅和厨房卫生良好。工厂提供了餐厅有效的食品经营许可证和所有10名厨工的健康证查看。工厂没有为员工提供交通工具, 员工自己回家。所以7.23不适用。7.24不适用因为工厂没有提供宿舍。然而执行过程中仍然有发现不符合项。</p>
7.1 -	<p>Insufficient occupational health checks was provided to the employees in the facility. No pre-job or post-job occupational health check was provided to the employees exposed to occupational hazard factor of heavy noise and hazardous chemicals. Besides, the facility provided on-job occupational health check for 60 out of 66 employees, the rest 6 employees were not provided with on-job occupational health check. According to the facility management, the 6 employees resigned when occupational health check was conducted. Due to new hires and resigned employees belonged to unstable workforce, it was difficult for them to calculate those employees, hence no pre-job or post-job occupational health check was arranged. Reference law: Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35</p> <p>工厂开展的职业病健康体检不充分。工厂没有给接触高噪音和危险化学品职业危害的员工提供岗前和离岗的职业病健康体检。此外工厂一共有66名员工需要参加在岗的职业病健康体检, 工厂为60名员工提供了职业病健康体检, 其他6名员工没有参加在岗职业病健康体检。工厂解释说由于这6名员工到体检当天离职了因此在岗的职业病没有给他们提供。由于新员工和离职员工属于不稳定工人, 工厂不好统计这些人因此没有安排岗前和离岗的职业病体检。法律法规: 中华人民共和国职业病防治法第三十五条</p>
7.3 -	<p>The facility did not conduct risk assessment on working positions. The facility identified the risk assessment for vulnerable workers, machines and equipment. According to the facility management, they ignored the risk assessment for working positions.</p> <p>工厂没有开展岗位风险评估。工厂有识别出来弱势群体, 机器和设备的风险。管理层解释说忽视了岗位风险评估。</p>
7.9 -	<p>The factory did not post occupation hazard notification in electroplating, paint-spray, blackening and automatic workshop. According to the facility management, they did not know the requirements. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24</p> <p>工厂没有在电镀, 喷漆, 发黑和自动化车间张贴职业危害告知卡。管理层表示不清楚有该要求。参考法律法规: 中华人民共和国职业病防治法 第二十四条</p>
Remarks from Auditee	

Performance Area 8 : No Child Labour	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES:	
None	
AREAS OF IMPROVEMENT:	
This was a follow up audit, PA 8.1-8.4 was not rated during the current assessment. 本次审核为复审, 8.1至8.4问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A Deadline date:	
<u>Good practices</u>	
Nil	
<u>Areas of improvement</u>	
<p>The policy of recruiting was set up by the factory. And it regulated that the factory would not recruit workers under 16. The factory checked workers' ID during recruiting and HR specialist knew the skills of asking workers' experience and ages when he had any doubt of workers' ID card or age according to interview with HR specialist. Meanwhile, the factory established remediation measure of child labor in order to set up measure of recruiting child labor incidentally. After checking all personnel files of workers, no child labor was identified in the factory.</p> <p>工厂制定了合适的招聘政策, 员工入职时工厂均会查看员工的身份证并且当人事专员对员工年龄有怀疑时, 会通过有技巧地面谈以核实员工情况。同时工厂制定了童工补救措施以防万一发现童工的应对措施。在审核过程中, 通过查阅所有员工的人事资料, 未发现有任何童工存在。</p>	
Remarks from Auditee	

Performance Area 9 : Special protection for young workers	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 9.1-9.6 was not rated during the current assessment. 本次审核为复审, 9.1至9.6问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> Nil	
<u>Areas of improvement</u> The policy of young worker protection was established by the factory. The facility understood the legal requirement of young workers according to interview with management. No young workers would be arranged to work in occupational hazards positions such as electroplating, paint-spray, blackening and automatic workshop. And the risk assessment procedure of young workers was established according to the requirement of Amfori BSCI. During this audit, no young worker was found in the factory. 工厂制定了未成年工的保护政策, 工厂了解如何依照法规要求保护未成年工。工厂不会安排未成年工在电镀, 喷漆, 发黑和自动化这些有职业危害的岗位工作。工厂按照Amfori BSCI要求来开展其未成年工的风险评估。在审核过程中, 未发现未成年员工。	
Remarks from Auditee	
Performance Area 10 : No Precarious Employment	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 10.1-10.4 was not rated during the current assessment. 本次审核为复审, 10.1至10.4问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> All workers except security guards and canteen staff were hired by the factory directly. Security guards and canteen staff enjoy the same rights with direct hired employees. The facility signed labor contracts with all employees and all of them obtained a copy of contracts. Also they ensure the employment relationship did not cause insecurity and social or economic vulnerability of workers. 除了厨工和保安, 其他员工都是工厂直接招聘的。保安跟厨工跟直接员工一样享有同等权利。工厂跟员工订立了劳动合同也提供了员工合同副本。同时订立劳动关系确保不会给员工带来不安全地位或者是让员工在社会地位或经济地位处于劣势。	
Remarks from Auditee	

Performance Area 11 : No Bonded Labour	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 11.1-11.4 was not rated during the current assessment. 本次审核为复审, 11.1至11.4问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The factory established the procedure on anti-forced labor. The discipline policy was also in line with legal requirement. According to onsite observation and statement of workers and management, workers confirmed that there was no evidence of forced labor showed in the factory, for example, they could resign according to legal requirement and they could leave the factory freely without being searched. No inhumane or degrading treatment was found during the audit and according to interview with workers. 工厂制定了反强迫劳动的程序, 工厂的惩戒政策也是符合法律法规要求。依据现场观察和管理层、员工访谈, 员工也很清晰地表明工厂内无强迫劳动的现象, 例如员工可以依照法规要求提出辞工而不会被克扣工资, 并且可以自由离开工厂。员工也未遇到任何被侮辱或非人道的待遇。	
Remarks from Auditee	
Performance Area 12 : Protection of the Environment	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 12.1-12.5 was not rated during the current assessment. 本次审核为复审, 12.1至12.5问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The environment protection policy was established. The facility collected laws and regulations on environment and updated them regularly. The facility obtained EIA report, EIA Approval and EIA acceptance report. The facility conducted monitoring on waste water, waste gas and noise each year. Industry waste water generated from the electroplating and paint spraying processes. The facility built one sewage treatment plant and valid waste discharge permit was maintained. Solid waste such as waste sludge, empty chemical containers, waste liquid of surface treatment process were recycled by qualified agency. Relevant transfer records were maintained for review. 工厂建立了环境保护方面的方针政策。工厂收集了环境方面的法律法规并且定期更新这些法规。工厂有获得环评报告, 环评批复和环保竣工验收。工厂每年对废水废气噪音开展监测。工厂生产电镀和喷漆工序产生废水, 工厂内部建立了污水处理设备。生产工序中产生的如废污泥, 化学品空桶和表面处理产生的废液都交由有资质单位回收。回收转移记录都有保留查看。	
Remarks from Auditee	

Performance Area 13 : Ethical Business Behaviour	
1- Followup Audit [Audit Id - 144372] Audit Date: 28/02/2019 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: This was a follow up audit, PA 13.1-13.4 was not rated during the current assessment. 本次审核为复审, 13.1至13.4问题没有评估。	
Remarks from Auditee:	
Full Audit [Audit Id - 119161] Audit Date: 19/03/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The facility established anti-bribery and anti-corruption Procedure. Regular training was provided. The anti-corruption risk assessment was conducted. Through the cross check between the production record, attendance record and worker interview, no inconsistency or falsified information was observed. The production record, such as warehouse material in and out record, final product inspection record and daily production record were collected and reviewed. 工厂已建立反贿赂、反腐败程序。工厂定期进行商业道德培训。工厂进行了反贿赂风险评估。通过与生产记录, 考勤记录和员工访谈交叉验证确认, 未发现不一致和虚假的信息。生产记录包括仓库出入库记录, 成品检验记录和日产量记录已经收集并提供审阅。	
<u>Remarks from Auditee</u>	

Summary 

Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Follow-up Audit	28/02/2019	144372	D	A	A	A	A	D	A	A	A	A	A	A	A	C
Full Audit	19/03/2018	119161	D	A	A	A	A	D	A	A	A	A	A	A	A	C

Producer Photos



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

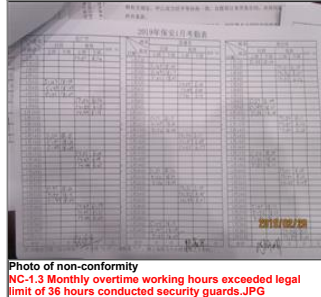


Photo of non-conformity
NC-1.3 Monthly overtime working hours exceeded legal limit of 36 hours conducted security guards.JPG



Photo of the inside of the main production hall
Heat-treatment workshop.JPG



External photo(s) of the production unit(s)
Facility outlook.JPG



Photo of non-conformity
NC-5.5 Insufficient social insurance coverage.JPG



Photo of the inside of the main production hall
Injection workshop.JPG



Photo first aid facilities
First aid kit.JPG

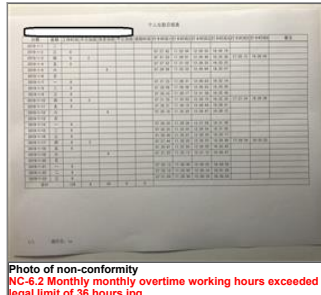


Photo of non-conformity
NC-6.2 Monthly monthly overtime working hours exceeded legal limit of 36 hours.jpg



Photo of the inside of the main production hall
No smoking sign.JPG



Photo of chemical storage room (if applicable)
Eye-wash station.JPG



Photo of non-conformity
NC-7.17 Production line without pulley guard.JPG



Photo of the inside of the main production hall
Packing workshop.JPG



Photo of chemical storage room (if applicable)
MSDS.JPG



Photo of non-conformity
NC-7.6 Printing worker not wearing provided rubber gloves
and goggles.JPG



Photo of the inside of the main production hall
Paint-spraying workshop.JPG



Photo of chemical storage room (if applicable)
Secondary container.JPG



Photo of the canteen (if applicable)
Canteen.JPG



Photo of the inside of the main production hall
Printing workshop.JPG



Photo of fire safety equipment
Directional evacuation sign.JPG



Photo of the canteen (if applicable)
Kitchen.JPG



Photo of the inside of the main production hall
Punching workshop.JPG



Photo of fire safety equipment
Emergency light and directional sign in the staircase.JPG



Photo of the code of conduct on display
amfori BSCI COC and poster.JPG



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



Photo of fire safety equipment
Emergency light testing.JPG



Photo of the inside of the main production hall
Accessory warehouse.JPG



Photo of the inside of the main production hall
Time-recording machine.JPG



Photo of fire safety equipment
Evacuation plot plan.JPG



Photo of the inside of the main production hall
Automatic workshop.JPG



Photo of the personal protection equipments (if applicable)
Ear-plugs used by production worker.JPG



Photo of fire safety equipment
Exit sign and emergency light.JPG



Photo of the inside of the main production hall
Blackening workshop.JPG



Photo of the personal protection equipments (if applicable)
Ear-plugs used by punching worker.JPG



Photo of fire safety equipment
Fire equipment internal inspection record.JPG



Photo of the inside of the main production hall
Control panel with safety warning.JPG



Photo of the personal protection equipments (if applicable)
PPE wearing warning sign.JPG



Photo of fire safety equipment
Fire equipment.JPG



Photo of the inside of the main production hall
Electroplating workshop.JPG



Photo of the sanitary facilities
Drinking water.JPG



Photo of fire safety equipment
Fire extinguisher in proper in pressure.JPG



Photo of the inside of the main production hall
Finished product warehouse.JPG



Photo of the sanitary facilities
Restroom with privacy door.JPG



Photo of fire safety equipment
Fire hydrant testing.JPG