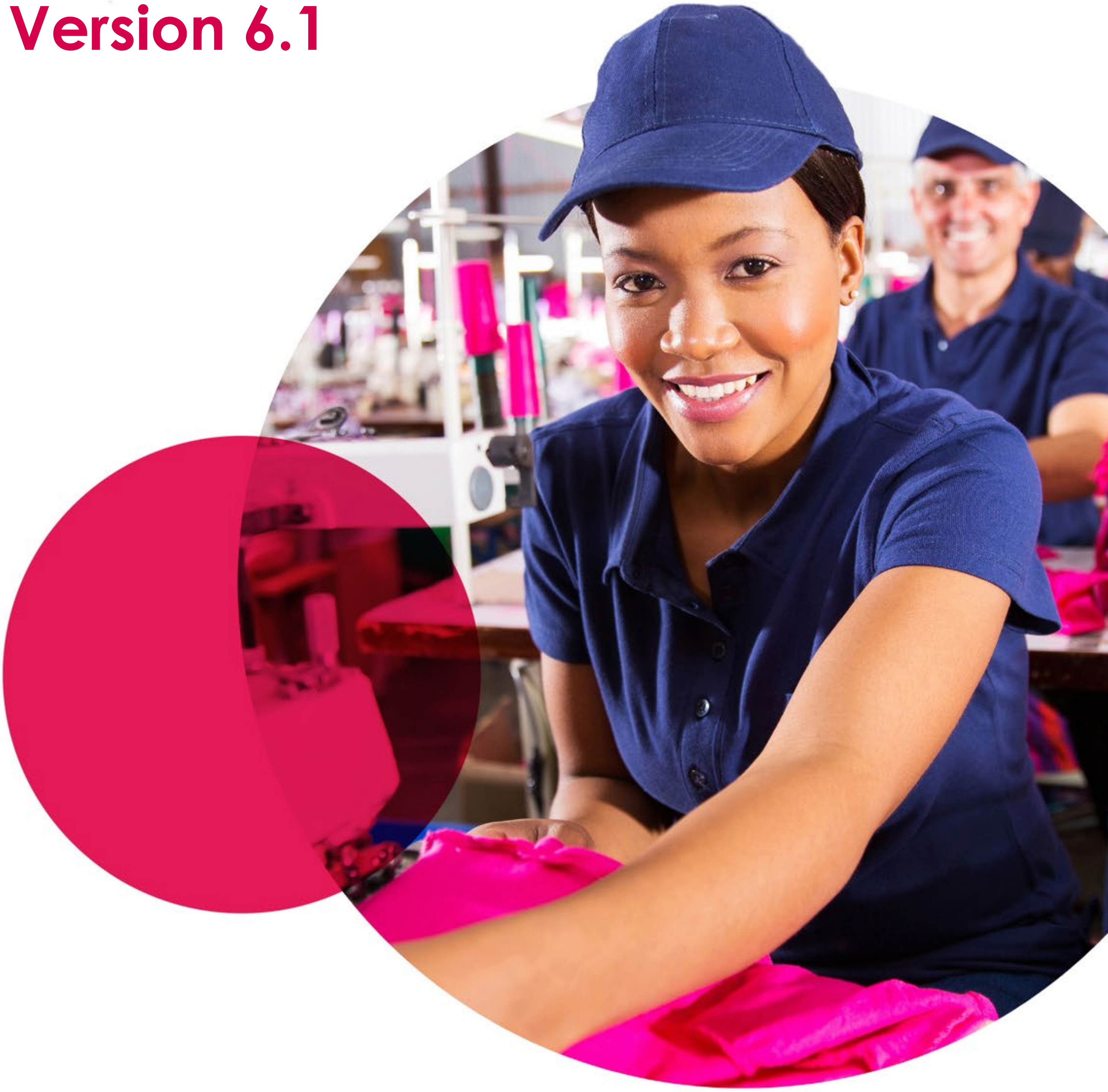
Sedex Members Ethical Trade Audit Report

Version 6.1



Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC407975441	Sedex Site Reference: *(only available on Sedex System)*	ZS408039086
Business name (Company name):	Qingdao Haikuan Huayuan Packaging Co Ltd		
Site name:	Qingdao Haikuan Huayuan Packaging Co Ltd		
Site address:	Zhangjiazhuang community, jihongtan street, chengyang district, Qingdao,China. Qingdao 266109 CN	Country:	CN
Site contact and job title:	Mr. Han Zhigang / Manager		
SMETA Audit Pillars:	☑ Labour Standards ☑ Health and Safety (plus Environment 2-Pillar)	☑ Environment 4-pillar	☑ Business Ethics
Date of Audit:	2023-06-01		

Audit Company Name:
Intertek Shenzhen

Audit Conducted By					
Affiliate Audit Company	☑	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐		Combined Audit (select all that apply)		

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

Auditor Team			
Lead Auditor:	Mark Chu	APSCA Number:	21700256
Additional Auditors:			
Date of declaration:	2023-06-02		

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

Site Representation	
Full Name:	Mr. Han Zhigang
Title:	Manager
Date of declaration:	2023-06-02
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	

Summary of Findings

Issue (please click on the issue title to go direct to the appropriate audit results by clause)	Area of Non–Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	0	
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.2	§1 §2	2	0	0	NC - ZAF600075226 NC - ZAF600075227
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid			0	0	0	
6 - Working hours are not excessive			0	0	0	
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2–pillar			0	0	0	
10B4 - Environment 4–pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.
§2	In accordance with Law of the PRC on Work Safety Article 45, Production and business entities shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use

Site Details

Site Details			
Company Name	Qingdao Haikuan Huayuan Packaging Co Ltd		
Site Name	Qingdao Haikuan Huayuan Packaging Co Ltd		
GPS location (if available)	**GPS Address:**	Zhangjiazhuang Community, Jihongtan Street, Chengyang District, Qingdao City, Shangdong Province	
	Coordinates:	Not provided	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license No.: 913702143341427708 Valid Date: From 21 April 2015 to 20 April 2035		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Tin Can		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	Qingdao Haikuan Huayuan Packaging Co., Ltd. was located at Zhangjiazhuang Community, Jihongtan Street, Chengyang District, Qingdao City, Shangdong Province. The total land area occupied by the facility was about 6000 square meters. They had been in operation at the existing location since 2015. A total of 28 employees including 21 female employees and 7 male employees were currently working in the facility. The youngest employee was 18 years old. There were 22 non-management employees and 6 management employees. 55% employees were local workers from Shandong, 45% employees were domestic migrant workers from Hebei and Henan. All employees were hired by the facility directly. All production employees worked for 5 days a week in one shift from 08:00-12:00, 13:00-17:00. Fingerprint system was used for time keeping for employees. Every employee would scan fingers when they went in and out of the workshops. Employees were calculated on an hourly rated basis and paid monthly by cash. The peak season was not obvious in the facility reported by the management. In view of the facilities, the facility used one flat building as production and warehouse, part of 1/F of one 3-storey building as office, No kitchen, canteen and dormitory at this site.		
Structure and number of buildings	**Building Name:**	Production	
	Floor	**Description**	**Remark**
	1	Production and warehouse	Year of establishment: 2004
	Building Name:	Office	
	Floor	**Description**	**Remark**
	1	Another facility,Office	Year of establishment: 2004
	2	Another facility	Year of establishment: 2004
	3	Another facility	Year of establishment: 2004

Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No Please give details: No visible crack was observed.
Does the site have a structural engineer evaluation?	☑ Yes ☐ No Please give details: The facility had provided construction safety certificates of the buildings for review.
Site function	☐ Agent ☑ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack house ☐ Primary Producer ☐ Service Provider ☐ Sub-contractor
Months of peak season	
Process overview	Cutting, soldering, moulding, packing
What form of worker representation is there on site?	☐ Union ☑ Worker Commitee ☐ Other ☐ None
Please give details:	Qingdao Haikuan Huayuan Packaging Co., Ltd. worker committee
Is there any night production work at the site?	☐ Yes ☑ No
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No Please give details: No dormitory at this site.

Audit Parameters					
Time in and time out	Day 1		Day 2		
	In	09:00	In	09:00	
	Out	17:00	Out	13:00	
Audit type:	FULL_INITIAL				
Was the audit announced?	ANNOUNCED				
Was the Sedex SAQ available for review?	Yes				
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No				
Who signed and agreed CAPR	Mr. Han Zhigang / Manager				
Is further information available	No				

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	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	N/A. There was no union representative in the facility.		
Reason for absence during the audit	N/A. There was no union representative in the facility.		
Reason for absence at the closing meeting	N/A. There was no union representative in the facility.		

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	4	0	0	3	0	0	0	7
Worker numbers – female	11	0	0	4	0	0	0	15
Total	15	0	0	7	0	0	0	22
Number of Workers interviewed – male	2	0	0	2	0	0	0	4
Number of Workers interviewed – female	4	0	0	2	0	0	0	6
Total – interviewed sample size	6	0	0	4	0	0	0	10

Nationalities Structure		
Nationality of Management	Chinese	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: CHINESE approx %: 100%	
Was this list completed during peak season?	☐ Yes ☑ No Please give details: N/A, the peak season was not obvious in the facility.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	100%
	Salaried:	0%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A

Worker Interview Summary	
Were workers aware of the audit?	☑ Yes ☐ No
Were workers aware of the code?	☑ Yes ☐ No
Number of group interviews:	1 group of 4 employees
Number of individual interviews:	Male: 3 Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes ☐ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	None
What did the workers like the most about working at this site?	Working environment is comfortable and wages are legal
Any additional comment(s) regarding interviews:	Nil
Attitude of workers to hours worked:	Favourable
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Attitude of workers:
10 employees were randomly selected for interview; they were interviewed as 1 group of 4 employees and the balance of 6 employees were interviewed individually. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility and that they were satisfied with 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 relationship with their supervisors and managers who treated them with respect. They could make suggestions to their supervisors and team leaders and sometimes they had seen these suggestions adopted. They could complain directly to their supervisors and felt free to give their general concerns to their worker representatives who would take it to the management.
Attitude of worker's committee/union reps:
One worker representative was interviewed. The interviewed worker representative was favourable with the management and the working conditions and stated that they could give suggestions on all parts of the site's practices, and the facility management would investigate their suggestions or concerns and respond to them in a timely manner.
Attitude of managers:
The management was open and cooperative throughout the process of the audit. The audited facility designated several management staff to be responsible for this audit, e.g. the facility assigned the tasks of coordinating the whole audit, accompanying the onsite tour, providing documents and arrangement of worker interviews etc. to several different management staff, and these assigned persons completed their assigned tasks well during the whole audit. The requested documents were provided in a timely manner. All necessary areas were allowed access for tour. A private room was arranged for workers' interview and the management allowed audit team to select workers for interviews. Photos taking of the facilities and copies' keeping of the samples of the reviewed documents were also permitted by the facility management. In the closing meeting, the management agreed with the found non-compliances and stated that they would take relevant corrective and preventive actions for the found non-compliances as soon as possible. The management did not raise any negative feedback for the audit.

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.Facility established a policy of social compliance which was endorsed at the highest level. The policy was communicated to all appropriate parties, including its own suppliers. 2. Mr. Han Zhigang / Manger was assigned to be responsible for implementing standards concerning human rights. 3. Stakeholders were identified by the facility. 4. The facility had measured impacts on stakeholders' human rights. 5. The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.
Evidence examined:
Policy of social responsibilities Appointment letter Stakeholders mapping Grievance reporting procedure Management and employee interview
Any other comments:
Nil

Policy statement that expresses commitment to respect human rights?	☑ Yes ☐ No Please give details: the policy expressed that human rights would be respected by the facility.
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: Policies included in workers' manuals
Does the business have a designated person responsible for implementing standards concerning Human Rights?	☑ Yes ☐ No Please give details: Mr. Han Zhigang / Manager

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☑ Yes ☐ No Please give details: An anonymous report system was established, such as suggestion box. The reporter's personal information would not be revealed, and the reporting practice would never affect the working arrangement or promotion/position.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes ☐ No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☑ Yes ☐ No Please give details: Relevant training regarding privacy procedures would be provided to employees when they joined the facility.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 2.0% This year 2.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	2.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	☑ Yes ☐ No Please give details: During injury log review, accidents were recorded and adequate action to prevent the accidents happening again was included in the log.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%

Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%	
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year	0.0%
	This year	0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month	0.0%
	12 month	0.0%

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
• The facility implements and maintains systems for delivering compliance to this Code. • Overall responsibility for meeting the standards is taken by Mr. Han Zhigang/ Manager • There is an internal audit team for internal audit of the social standards of the facility and they report to the general manager to report their findings. • Implementation of any necessary changes is then given to the individual department heads after agreement with the vice general manager. • The facility communicates this code to all employees by regular trainings. • The facility communicates the code to their suppliers through providing copy of CSR manual and asking suppliers to sign the written social compliance commitments; and the facility also conducted social compliance assessments for its suppliers annually.
Evidence examined:
• A CSR manual created by the facility which contained all required documents and all appropriate procedures for meeting the client's code of conduct and the legal requirements. • Appointment papers for compliance responsible persons. • Internal audit documents (e.g. annual audit reports) from the internal audit team. • ETI requirement at the facility. • Training records for employees. • Written social compliance commitments from Suppliers and social compliance assessment reports for its suppliers. • Management interview and employee interview.
Any other comments:
Nil

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details: Through online checking, no fine or prosecution for non-compliance to any regulation was found in the facility.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: The facility had established and implemented the policies and procedures for forced labour, child labour, discrimination, harassment and abuse, and the facility had provided relevant trainings for workers

If Yes, is there evidence (an indication) of effective implementation? Please give details.	Yes. The facility had established and implemented the policies and procedures for forced labour, child labour, discrimination, harassment and abuse. No non-compliance regarding forced labour, child labour, discrimination, harassment or abuse was found in the facility. There were both female and male among managers and supervisors.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: The facility provided regular trainings (upon hiring and annually afterwards) about the standards of forced labour, child labour, discrimination, harassment and abuse for both management and workers, which was confirmed by the provided training records and interviews with both management and workers
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☑ Yes ☐ No Please give details: Regular training records were provided for review. The employees were aware clearly of the facility's relevant policies and procedures about forced labour, child labour, discrimination, harassment and abuse according to the interviews, and no such case happened before.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	☐ Yes ☑ No Please give details: N/A
Is there a Human Resources manager/department?	☑ Yes ☐ No The facility had Administration and HR department which in charge of the recruitment of workers, assignment of employees' post, etc.
Is there a senior person /manager responsible for implementation of the code?	☑ Yes ☐ No Please give details: The appointed management responsible for compliance with the Code was Mr. Han Zhigang /Manager
Is there a policy to ensure all worker information is confidential?	☑ Yes ☐ No Please give details: The facility established and implemented the policy and procedure for safeguarding workers' confidential and private data and information.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes ☐ No Please give details: All employees' personal information would be kept and only accessed by authorized staff, such as HR staff.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	☑ Yes ☐ No Please give details: Risk assessment was conducted annually by the facility to evaluate the effectiveness of the policy and procedure for safeguarding workers' confidential and private data and information.

Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: There was an internal audit team for internal audit including risk assessment of the social standards of the facility. According to the risk assessment report, the facility had a process to reduce identified risks.
Does the facility have a policy/code which require labour standards of its own suppliers?	☑ Yes ☐ No Please give details: The facility had its supplier selecting policy and procedure to ensure all suppliers were compliance with the labour standards and this code. The facility communicated the code to their suppliers through providing copy of CSR manual and asking suppliers to sign the written social compliance commitments.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☑ Yes ☐ No Please give details: The facility had provided the valid land using permit of the facility buildings for reviewing.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☑ Yes ☐ No Please give details: The facility had conducted due diligence about the national laws and practices relating to land title through visiting government's website, consulting the government officials and verifying the legal documents of the land. A person was appointed to be responsible for updating the applicable law lists and conducting internal audit for this point.
Does the site have a written policy and procedures specific to land rights?	☑ Yes ☐ No Please give details: The facility would public the land acquisition plan and obtains the free, prior and informed consent through internet.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	☑ Yes ☐ No Please give details: The facility acquired and used the land according the legal procedure and project's requirement.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☑ Yes ☐ No Please give details: Not applicable, the facility did not have plan of land acquisition.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No Please give details: No such evidence was found in the audit. There was no illegal appropriation of land for facility building or expansion of footprint

1 - Freely chosen Employment [Summary of Findings]
1: Compliance Requirements 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. The interviewed employees raised no concerns of forced or bonded labour. They stated that they are free to leave their working stations once their shifts end. 2. The interviewed employees stated that they are not required to pay any 'deposits' or leave their ID cards with the employer. 3. Facility tour showed no sign of employees being under pressure.
Evidence examined:
1. The facility's hiring procedure was reviewed. The procedure included the following clauses: the facility did not require deposit or withhold employees' ID cards; the facility did not limit the employees' freedom; there was no forced, bonded or involuntary prison labor; and employees were free to leave their employer after reasonable notice. 2. Employment contracts contained the notice periods when the employees would like to leave their employer. 3. Management interview and employee interview. 4. Facility tour indicated no sign of employees being forced, bonded or involuntary.
Any other comments:
Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☑ No Please give details: N/A
If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable Please give details: N/A

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No Please give details: N/A
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☑ Yes ☐ No ☐ Not Applicable Please give details: Facility tour indicated no sign of employees being forced, bonded or involuntary.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes ☐ No Please give details: Not applicable, through the documents review and management interview, there was no forced / trafficked labour in its supply chain

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
According to facility management interview, they never interfered in any legal activities which were organized by their employees. According to employee interview, there was one workers' committee in the facility; employees could send their grievances through workers' committee and suggestion box.
Evidence examined:
1. There was one workers' committee in the facility as per employees' interview and management interview. Employee handbook and employment rule were provided for review. 2. Record from the workers' committee meeting and what relevant actions have been taken was reviewed. Facility management commented that they collect the suggestions from workers' committee and suggestion box and review them in the management meeting monthly. If agreed, they will take the relevant actions to improve. 3. Management interview and employee interview.
Any other comments:
Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union ☑ Worker Commitee ☐ Other ☐ None
Other details:	Qingdao Haikuan Huayuan Packaging Co., Ltd. worker committee
Is it a legal requirement to have a union?	☐ Yes ☑ No
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	☑ Yes ☐ No Please give details: Suggestion box and meeting with management.
Is there evidence of free elections?	☑ Yes ☐ No
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☑ Yes ☐ No Please give details: There was no any restriction on the committee and the employee committees could organize activities in the facility freely
Name of union and union representative, if applicable:	N/A

Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker's committee
Is there evidence of free elections?	☑ Yes ☐ No ☐ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes ☐ No Please give details: The interviewed employees confirmed that the worker committee representatives were selected by them
Were worker representatives freely elected?	☑ Yes ☐ No
Date of last election:	2023-03-13
Do workers know what topics can be raised with their representatives?	☑ Yes ☐ No
Were worker representatives/union representatives interviewed?	☑ Yes ☐ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Last worker's committee meeting conducted in March 2023, topics regarding the worker representatives freely election were discussed, the meeting minutes were pasted on public board for employees' acknowledgement.
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

3 - Working Conditions are Safe and Hygienic [Summary of Findings]
3: Compliance Requirements 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. 3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers. 3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers. 3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
General Health and Safety management - Written Health and Safety Policy and Health and Safety Manual were available. - Mr. Han Zhigang/ Manager was appointed as Health & Safety Supervisor for the site. - Minutes of meetings showed that there were monthly meetings between the H&S committee (workers) and the H&S supervisor, and each point was acted on. - Potable water was freely available in all areas and test certificates were up-to-date. - Sufficient clean toilets segregated by gender were available at all times to employees. - Ventilation, temperature and lighting were adequate for the workplaces. - Accident reports were available. 2. Fire Safety - For production building, there were at least 2 exits from each work area and these were clearly marked. - Fire-fighting equipment's' monthly inspection records were available. - Fire-fighting equipment's were maintained well. - The open directions of the exit doors were adequate. - Evacuation routes were unblocked. - "No smoking signs" were available throughout the factory. - Evacuation diagrams were posted in all areas and understood by all employees interviewed. - Fire drills were organised and recorded every 6 months for production units 3. Electrical safety - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards. - There was 2 competent electrician at the site and the qualification certificates was valid. 4. Medical services - There were adequate first aid kits in each production area and they were well stocked. - There were total 5 first aiders who had been trained at a local hospital
Evidence examined:

- Health and safety policy - Health and safety manual - Appointment document for the Health and Safety Supervisor - Health and safety committee minutes - Potable water testing report - Toilet cleaning records - Temperature recording sheets; valid testing report on air quality and noise level. - Registration certificate, annual testing report, and the operator licenses of the forklift - Fire certificate or registered record - Construction safety certificate - Accident reports - PPE issuing and receiving records - Fire equipment's' monthly maintenance and inspection records - Fire drill records - Electrical equipment's' maintenance and inspection records - The certificate of the electrician - Trained first aiders' certificates - Onsite observation - Interviews with H&S supervisor - Interviews with employees and H&S committee members
Any other comments:
Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☑ Yes ☐ No Please give details: The facility had established and implemented the valid Health and Safety policies and procedures covering the occupational health and safety section and provided the pre-work and annual trainings on the subject of the Health and Safety policies and procedures to all workers, which was confirmed by the provided training records and worker interviews.
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: The facility had established and implemented the valid Health and Safety policies and procedures covering the occupational health and safety section, which was included in the worker's manual.
Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☑ No Please give details: There was no any structural addition.
Are visitors to the site informed on H&S and provided with personal protective equipment?	☑ Yes ☐ No Please give details: All visitors to the facility were informed on the facility's health and safety policy and procedure and provided with adequate personal protective equipment.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	☐ Yes ☑ No Please give details: No medical room or medical facility was provided for the employees, and there was no such legal requirement for the facility. But there was a hospital nearby the facility.

Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☑ Yes ☐ No Please give details: There was no doctor or nurse in the facility, and doctor or nurse was also not required legally for the facility. There were first aiders who had been trained at a local hospital and there were first aid kits with adequate first aid supplies on all facility floors, so the employees were easy access to first aid and first aiders.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☑ No Please give details: Not applicable, the facility did not provide transportation to the employees.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☑ No Please give details: No dormitory at this site.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☑ Yes ☐ No Please give details: The facility had conducted H & S risk assessment annually and relevant records was in place.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☑ Yes ☐ No Please give details: The facility was meeting its legal obligations on environmental requirements.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☑ Yes ☐ No Please give details: The facility met its customer requirements on environmental standards. The facility had the internal audit team and the internal audit team conducted regular internal inspections and audits against the updated & strictest environmental and chemical requirements and standards, if any violation about environment or chemical was found, the internal audit team would analyse the root cause, take corrective and preventive actions accordingly.

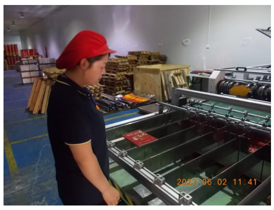
Non-Compliance	Evidence
[Back to findings summary]	

Non-Compliance	
Status	OPEN
Reference	ZAF600075226
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	230 - No material safety data sheet (MSDS) obtained / available
Subcategory	Chemicals
New or carried over?	☑ New ☐ Carried Over
Root cause	☑ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with the Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
Explanation to the non compliance	MSDS were not available for hazardous chemicals. During facility tour, auditor found that the facility stored glue at the chemicals warehouse on 1/F at production building. However, no MSDS (Material Safety Data Sheet) was provided in these areas 危险化学品场所没有MSDS。在现场巡查时，审核员发现企业在生产楼一楼化学品仓库有储存胶水，但该场所没有相应危险化学品的MSDS（物质安全技术资料表）
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended that the facility should ensure MSDS is available for hazardous chemical in the workplace

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	ZAF600075227
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate
Subcategory	Personal Protective Equipment/Clothing
New or carried over?	☑ New ☐ Carried Over
Root cause	☑ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other
Root cause - Other	
Local law issue	In accordance with Law of the PRC on Work Safety Article 45, Production and business entities shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use
ETI code	3.2 - Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
Explanation to the non compliance	Employees did not properly wear PPE (Personal Protective Equipment). During facility tour, auditor found that 1 out of 1 employee working in the cutting workshop on 1/F at one flat production building did not wear earplugs which were provided by facility. 员工未按要求佩戴劳动防护用品。在现场巡查时，审核员发现在一栋1层的第1层裁剪车间有1名员工正在进行作业，其中有1名没有佩戴企业提供的耳塞。
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☑ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended that the facility should supervise and train the employees on properly wearing PPE



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4 - Child Labour Shall Not Be Used [Summary of Findings]
4: Compliance Requirements 4.1 There shall be no new recruitment of child labour. 4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child. 4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions. 4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1The facility had established policy/procedure on prohibition of child labour. 2Once employees had joined their original ID's were copied and given back to them whilst copies only were kept in their personnel file. 3Checks of all employees' files showed that the youngest employee present was age 18 years. There was no child labour was hired.
Evidence examined:
1Personnel files of all employees 2Updated employee roster 3Recruitment policy/procedure 4Health examination report 5Management and employee interview
Any other comments:
Nil

Legal age of employment:	16
Age of youngest worker found:	18
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No Please give details: N/A

5 - Living Wages are Paid [Summary of Findings]
5: Compliance Requirements 5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. 5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. 5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
• All employees' wages were calculated by hourly-rated basis. The minimum wages paid by the facility were RMB 2100 per month since 1 October 2021. • All employees' wages were calculated by hourly rate. • The wages office was well organized with a good controlled set of processes which are understood by all employees. • All employees 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. • All employees had participated in five types of social insurance • All employees were paid on or before 20th of each month by cash for last working period, clear wage slip was offered. • Payroll records from May 2022 to April 2023 and attendance records from 1 May 2022 to 1 June 2023(audit day) were reviewed.
Evidence examined:
• Document review • Employee interview • Local and national laws • Wages and benefits policy • Local legal minimum wage documents • Payroll records from May 2022 to April 2023 and attendance records from 1 May 2022 to 1 June 2023(audit day) were reviewed. • Leave records • Social insurance and payment receipts from the local labour department • Labour contracts for all employees (to examine agreed wage rates) • Resignation records
Any other comments:
Nil

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 168.0	NO

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 16.0 Per Month: 32.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 2100.0	Actual Per Day: 96.55 Per Week: 482.76 Per Month: 2100.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 0.0	NO

Wages Analysis:	
Were accurate records shown at the first request?	☑ Yes ☐ No
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples from April 2023 (current month) 10 samples from December 2022 (random month) 10 samples from October 2022(random month)
Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No
If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ Not Applicable Please give details:
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☑ Meet ☐ Above
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	RMB 2100 per month equivalent to RMB 12.07(2100/21.75/8) per hour since 1 October 2021
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage
Bonus Scheme found: Please specify details:	Bonus Scheme found:Perfect attendance bonus as RMB 100 per month and Post allowance RMB 500~1600 per month was found Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.
What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, personal income tax, etc
Have these deductions been made?	☑ Yes ☐ No
Please list all deductions that have been made.	1. Social insurance 2. Personal tax
Please list all deductions that have not been made.	Nil
Were appropriate records available to verify hours of work and wages?	☑ Yes ☐ No
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No

Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☑ Yes ☐ No Please give details: No incomplete or inconsistent record was noted.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No Please give details:
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation ☐ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☑ Yes ☐ No Please give details: The facility conducted assessment at least once per year. Based on the provided payroll records, the minimum wage paid by the facility met the local minimum wage requirement.
Are workers paid in a timely manner in line with local law?	☑ Yes ☐ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes ☐ No Please give details: It was confirmed through document review and employee interview.
How are workers paid:	☑ Cash ☐ Cheque ☐ Bank Transfer ☐ Other

6 - Working Hours are not Excessive [Summary of Findings]
6: Compliance Requirements 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where all of the following are met: 6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1Working time policy and controlling procedure were established and implemented in the facility. 2Overtime was voluntary. 3Fingerprint system was used for time keeping 4No inconsistency regarding the employees' wages and working time was found between the payrolls, the attendance records, the production related records and employee's interviews, etc. 5According to provided attendance records and employee interview, basic working hours were 8 hours per day and 40 hours per week.
Evidence examined:
1Facility policy on working hours 2Fingerprint system was used for time keeping 3Employees contracts 4Payroll records from May 2022 to April 2023 and attendance records from 1 May 2022 to 1 June 2023(audit day) were reviewed. 5Production records (such as Material Inspection Record, Inspection Record, Finished Goods Inspection Record, Finished Goods Delivery Record, etc.) were also reviewed. 6Management and employee interview
Any other comments:
Nil

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Fingerprint
Is sample size same as in wages section?	☑ Yes ☐ No Please give details:

Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes ☐ No
Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes ☐ No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	☐ Yes ☑ No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: Daily overtime hours: 2 hours per day in April 2023 (current month) 2 hours per day in December 2022 (random month) 2 hours per day in October 2022 (random month) Highest Monthly overtime hours: 32 hours per day in April 2023 (current month) 32 hours per day in December 2022 (random month) 24 hours per day in October 2022 (random month) Highest Weekly overtime working hours: 8 hours per day in April 2023 (current month) 8 hours per day in December 2022 (random month) 8 hours per day in October 2022 (random month)
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: Combined hours were not over 60.
Approximate percentage of total workers on highest overtime hours:	100.0%

Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes ☐ No ☐ Conflicting Information Please give details: Through working hours' policy and employees' interview, the employees would only need to tell the direct supervisor orally if they did not want to have overtime work.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☑ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium Please give details: 150% of standard wages are paid for overtime on normal days
Is overtime paid at a premium?	☑ Yes ☐ No 100% employees were paid monthly
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No ☐ Consolidated pay ☐ Collective Bargaining agreements ☑ Other
Please give details	N/A
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☑ Other reasons (please specify)
Please give details	N/A
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A, the weekly working hours did not exceed 60 hours.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No

7 - No Discrimination is Practiced [Summary of Findings]
7: Compliance Requirements 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1The facility had anti-discrimination policy and procedure; 2As informed by interviewed employees, most employees spoke highly of the facility owner. 3No employee was required to do the examination of the hepatitis B virus and HIV. 4No female employee was required to do the examination of pregnant test. 5Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work. 6There was no evidence of sexual harassment. 7No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union or workers' organisation membership or political affiliation was found in the facility. 8There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases. 9The regular trainings on anti-discrimination were provided to the employees.
Evidence examined:
1Anti-discrimination policy and procedure 2Regular training records on anti-discrimination 3Hiring and termination procedure, leave application records and employee handbook 4Payroll records from May 2022 to April 2023 5Termination records 6Management and employee interview
Any other comments:
Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 50.0%		Female: 50.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	0		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Hiring ☐ Promotion	☐ Compensation ☐ Termination or retirement	☐ Access to training ☑ No evidence of discrimination found
Please give details	Not applicable (no discrimination about hiring, compensation, access to training, promotion, termination or retirement was found).		
Professional Development			
What type of training and development are available for workers?	The on-going work skill trainings were available for all employees to progress and develop. The criteria for promotion, training and compensation were equal, fair and transparent for all employees.		

Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes ☐ No

8 - Regular Employment Is Provided [Summary of Findings]
8: Compliance Requirements 8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice. 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment. Additional Elements: Responsible Recruitment 8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements. 8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation. 8.5 Employment agencies must only supply workers registered with them. 8.6 Workers pay no recruitment fee at any stage of the recruitment process. 8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1The facility signed labor contracts with all employees and the terms and conditions stated in the contracts complied with local laws. All employees received copies of the contracts of employment. 2All employees were recruited by the facility directly. No labour agency was used to hire employees. No temporary employee, apprenticeship schemes or home employee was identified by the auditors. 3No subcontracting or home-working existed in the facility.
Evidence examined:
1The hiring and termination procedure 2Personal files including a copy of employee's contract 3Payroll records from May 2022 to April 2023 were provided for review. 4Management and employee interview
Any other comments:
Nil

Responsible Recruitment	
All Workers	
Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	☑ Terms & Conditions presented ☑ Understood by workers ☑ Same as actual conditions
Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)	☐ Yes ☑ No
Migrant Workers	
Type of work undertaken by migrant workers:	All types of work included migrant employees in the facility.

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☑ No Please give details: Not applicable (there was no such kind of deduction from the employees' wages).
Is there any observation on this finding?	Not applicable (there was no such kind of deduction from the employees' wages).
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☑ Yes ☐ No Most of migrant workers in technical roles
Non-employee workers	
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	Not applicable (there was no agency employee in the facility).
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No
Is there a legal contract agreement with all agencies?	☐ Yes ☑ No Please give details: Not applicable (there was no agency employee in the facility).
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No Please give details: Not applicable (there was no agency employee in the facility).
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	☐ Yes ☑ No Please give details: Not applicable (there was no contractor in the facility)
Do all contractor workers understand their terms of employment?	☐ Yes ☑ No Please give details: Not applicable (there was no contractor in the facility)

8A - Sub–Contracting and Homeworking [Summary of Findings]
8A: Compliance Requirements 8.A.1 There should be no sub–contracting unless previously agreed with the main client. 8.A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1The facility had established a policy to ensure sub-contracting would not be used unless previously agreed with the main client. 2All processes were finished within the facility. 3No home-working was used by this facility.
Evidence examined:
1 Policy on sub-contracting 2Reviewing of the production records such as materials in/out records 3Facility tour (Calculation on total production and estimated capacity) 4Management interview and employee interview
Any other comments:
Nil

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

9 - No Harsh or Inhumane Treatment is Allowed [Summary of Findings]
9: Compliance Requirements 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. 9.2 companies should provide access to a confidential grievance mechanism for all workers

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1The facility established anti-harsh or anti-inhumane treatment policy. The policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. 2The facility established a disciplinary procedure for employees' misbehaviour. 3The anti-harsh or anti-inhumane treatment policy and disciplinary procedure were communicated to the employees through regular trainings. 4Employee interview confirmed that employees were aware of anti-harsh or anti-inhumane treatment policy and disciplinary procedure. 5There was an internal process for grievance, where employees could report any grievances (harassment, bullying, discrimination etc.) and any received complaint would be handled by management. The grievance mechanisms were legitimate, accessible and equitable. 6All above information was also confirmed by interviewed employees.
Evidence examined:
1Anti-harsh or anti-inhumane treatment policy and disciplinary procedure 2Training records regarding anti-harsh or anti-inhumane treatment policy and disciplinary procedure 3Internal grievance procedure 4Facility tour 5Management and employee interview
Any other comments:
Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes ☐ No Please give details: The facility had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for its employees, external communities and other stakeholders to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings.
If yes, are workers aware of these channels and have access? Please give details.	According to the employee interview and onsite observation, the employees were aware of these channels and could access these channels freely for reporting any violations without fear of reprisal towards them.

If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	The facility had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for its employees, external communities and other stakeholders to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings.
Which of the following groups is there a grievance mechanism in place for?	☑ Worker ☑ Communities ☑ Suppliers ☐ Other
Please provide grievance mechanism details	The grievance mechanism included a provision for non-retaliation, and it allowed employees to report issues anonymously.
Are there any open disputes?	☐ Yes ☑ No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☑ Yes ☐ No Please give details:
Is there a published and transparent disciplinary procedure?	☑ Yes ☐ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes ☐ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

10A - Entitlement to Work and Immigration [Summary of Findings]
10A: Compliance Requirements 10.A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Per document review, facility management representation and employee interview, all employees in the facility were Chinese 2. All employees had the proper legal rights to work in this region. The youngest age was 18 years old. All of them were recruited directly by the facility and no agency was involved in facility's recruitment processes. 3. No agency staff or foreign employee was used by the facility.
Evidence examined:
1. Hiring procedure 2. Personnel files 3. Employee handbook 4. Facility tour 5. Management interview and employee interview
Any other comments:
Nil

10B4 - Environment 4–Pillar [Summary of Findings]
10B4: Compliance Requirements 10.B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10.B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10.B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10.B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10.B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10.B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details). 10.B4.7 Businesses shall make continuous improvements in their environmental performance. 10.B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10.B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance. 10B4: Guidance for Observations 10.B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10.B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations. Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. Mr. Han Zhigang / manager was responsible for the environment management system in the facility. 2. The facility had written environmental policy and an environmental management system was in place. 3. All hazardous materials including waste have been properly classified, handled, stored in the facility. The hazardous waste is transported and disposed by a qualified vendor. 4. An adequate and effective program was in place, including objectives and targets to identify, manage and reduce the impact of all types of wastes. 5. The facility conducted a risk assessment to evaluate the significant environmental impacts of its sites and processes and was aware of the significant environmental impact of their site and its processes. 6. The legally required certificates including the environmental impact assessment document (EIA) and environmental protection acceptance checks report for completed construction project were available and valid during this audit. 7. The annual monitoring report for waste air and water showed the pollutant discharging was compliance with environmental law. 8. Based on observation on site, wastes were classified and collected on site. 9. Based on employees' interview, they were trained on environmental protection.
Evidence examined:

The environmental impact assessment document (EIA) and environmental protection acceptance checks report for completed construction project were provided for review. Environment training records and materials. Environmental policy Waste management procedure Pollution monitoring report Energy bills Water bill Employees' interview and Management Interview Site tour
Any other comments:
Nil

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Mr. Han Zhigang/ manager
Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: Risk assessment on the environmental impact of the site was provided for review.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	☐ Yes ☑ No Please give details: N/A
Does the site have an Environmental policy?	☑ Yes ☐ No
If yes, is it publicly available?	☑ Yes ☐ No
If yes, does it address the key impacts from their operations and their commitment to improvement?	☑ Yes ☐ No Please give details: The policy has included their commitment to continuous improvement environmental performance.
Does the site have a Biodiversity policy?	☐ Yes ☑ No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	☐ Yes ☑ No Please give details: Site does not have any environmental certifications
Have all legally required permits been shown?	☑ Yes ☐ No Please give details: The facility provided the approval for environment impact assessment report for review.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☑ Yes ☐ No ☐ Not Applicable Please give details: Site had formalized a documentation process for hazardous chemicals used.

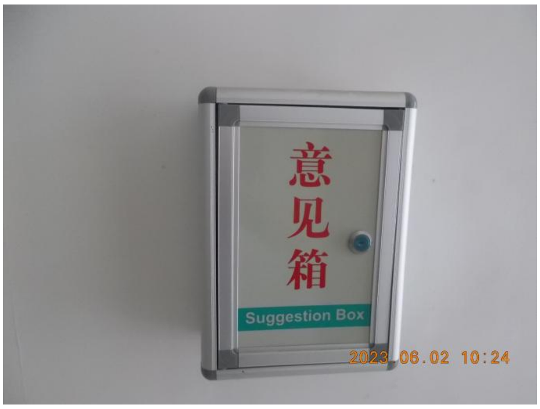
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☑ Yes ☐ No Please give details: This is included in the site's internal management system.	
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes ☐ No Please give details: Reduction target was included in environmental policy.	
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☑ Yes ☐ No Please give details: The facility is monitoring volume of waste that is recycled and provided documents review.	
Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	☑ Yes ☐ No Please give details: Water and energy consumption records were provided for review.	
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☑ Yes ☐ No Please give details: This was included in assessment of suppliers.	
Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	340560	110340
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	Local water authority	Local water authority
Water Volume Used	750	246
Water Discharged	Local water authority	Local water authority
Water Volume Discharged	750	246
Water Volume Recycled	0	0
Total waste produced	6 T	2 T
Total hazardous waste produced	750 KG	220 KG
Waste to recycling	0	0
Waste to landfill	0	0
Waste to other	0	0
Total Product Produced	3600000 PCS	1200000 PCS

10C - Business Ethics – 4-Pillar Audit [Summary of Findings]
10C: Compliance Requirements 10.C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. 10.C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10.C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements. 10.C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10.C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, 10.C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics 10.C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area. 10C: Guidance for Observations 10.C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10.C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. There was no identified risk that employees who refuse to participate in bribery, facilitation payments or who have declared conflicts of interest are not supported by the business or suffer demotion, penalty or other adverse consequences even if this action may result in the enterprise losing business. 2. The facility had a policy for promoting workers/employees to declare conflicts of interest and a procedure for protecting employees from refusing to do anything in non-conformance with the ethics policy. 3. The facility encouraged all employees and employee of suppliers to report suspected violations of business conduct. The facility set confidential reporting channels including grievance box, hot line and any reporting channel can be available for workers at any time and hotline are available for employees of suppliers to confidentially report any misconduct 4. The business ethics policies were included in the employee handbook, covering bribery, corruption, or any type of fraudulent Business Practice. All employees received a copy, and their induction includes training in these policies. Employees were aware of the company policies. 5. The employees and management were trained on Business Ethics Policy/Procedure through orientation training and annual refresh training. 6. Business Ethics Policy/Procedure was transmitted to the suppliers by written agreement.
Evidence examined:
Business ethics policies/Procedures. Training records and training materials. Employee handbook. Written agreement with suppliers. Employee interview and management interview.
Any other comments:
Nil

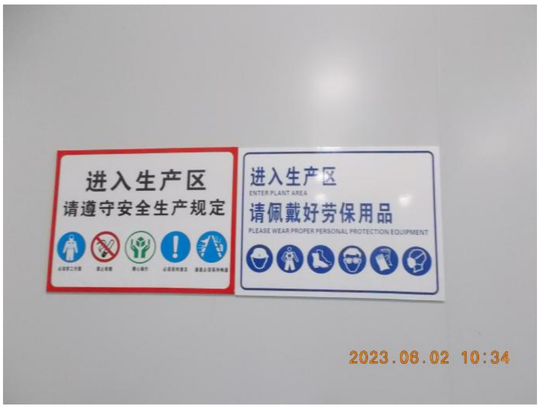
Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☑ Internal Policy ☑ Policy for third parties including suppliers Please give details: The facility had a formal policy on highest integrity business standards and zero tolerance on all forms of bribery, corruption, extortion and embezzlement in place, which is applied internally from workers to senior manager and externally for its own suppliers.
Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☑ Yes ☐ No Please give details: The facility has provided training for management and workers on policy on zero tolerance on all forms of bribery, corruption, extortion and embezzlement and conflict of interest process.
Is the policy updated on a regular (as needed) basis?	☑ Yes ☐ No Please give details: The facility reviewed its business ethics policy regularly.
Does the site require third parties including suppliers to complete their own business ethics training	☑ Yes ☐ No Please give details: The facility had communicated the business ethics to its own suppliers by written agreement.

Attachments

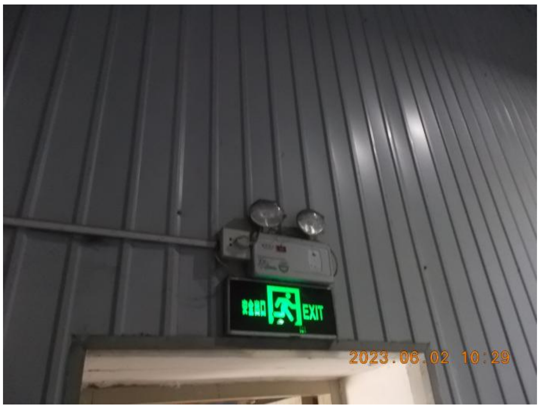


Suggestion box.JPG

Attendance machines.JPG

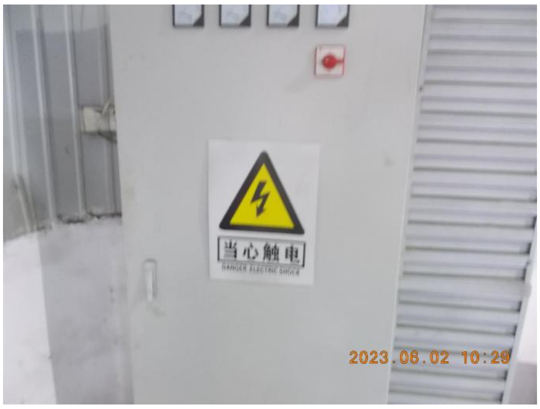


PPE sign.JPG

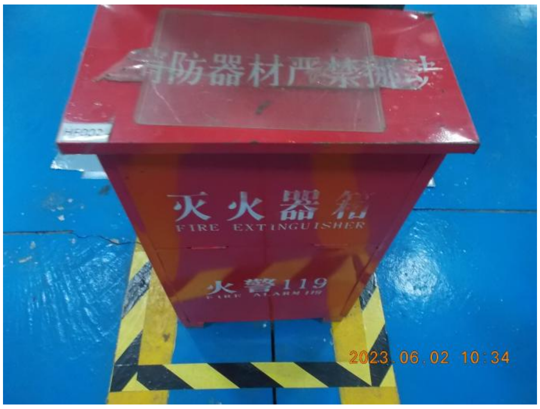


Exit sign and emergency light.JPG

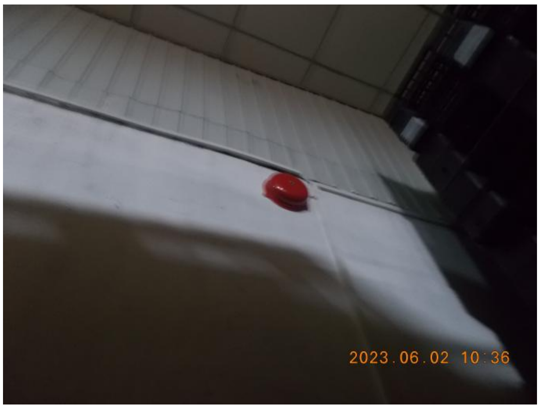
Toilet.JPG



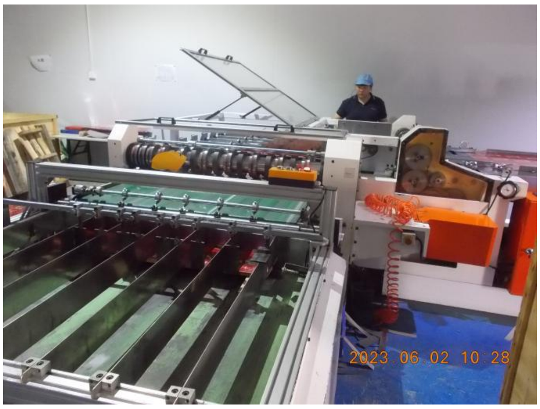
Electric box.JPG



Fire extinguishers.JPG

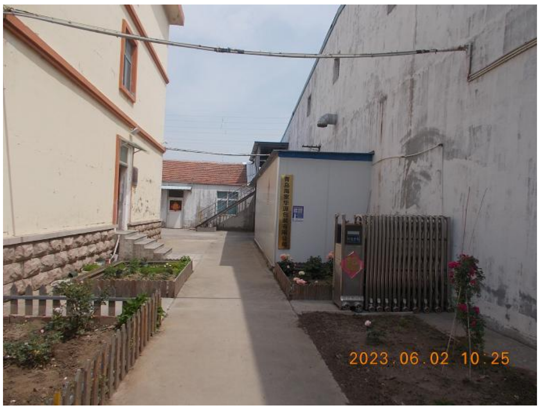


Fire alarm.JPG



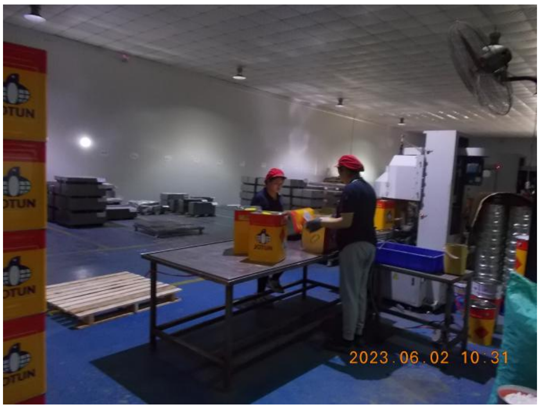
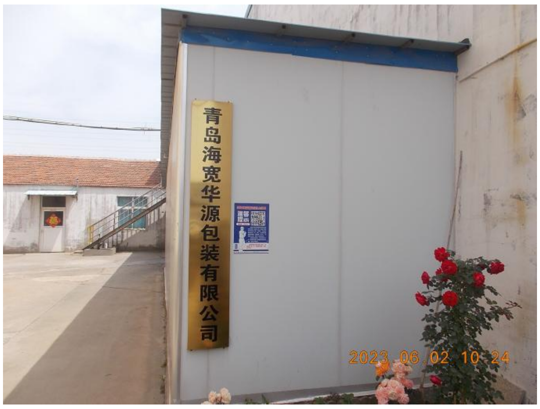
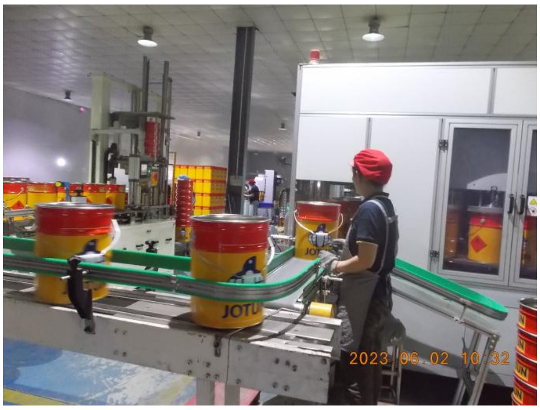
Cutting.JPG

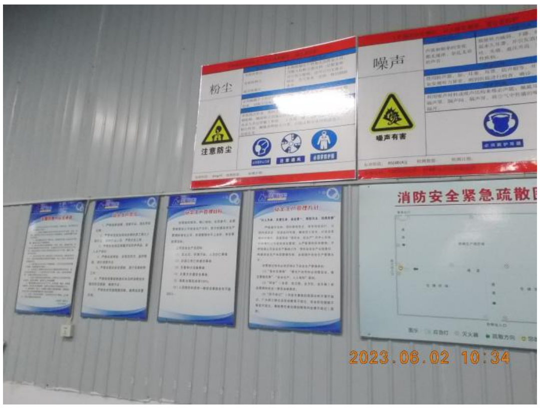
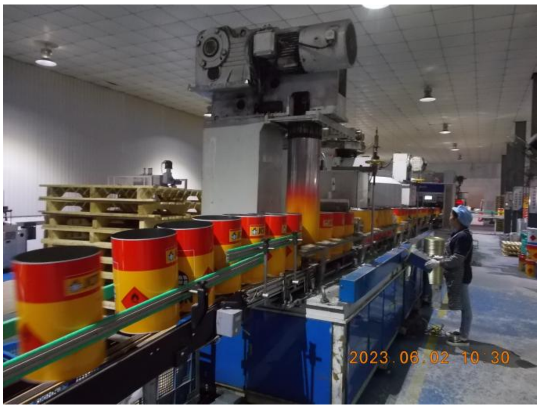
Raw materials warehouse.JPG



Facility gate.JPG

No smoking sign.JPG

 Moulding.JPG	 Inspection and packing.JPG
 Fire hydrant.JPG	 Facility name.JPG
 Inspection.JPG	 Finished goods warehouse.JPG

 Notice board.JPG	 Soldering.JPG

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http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d

Click here for Auditors:

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