Sedex Members Ethical Trade Audit (SMETA) Report

Version 5.0 Dec 2014, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	YiWu EE JEWELERY CO., LTD.		
Site country:	China		
Site name:	YiWu EE JEWELERY CO., LTD.		
Parent Company name (of the site):	Not applicable		
SMETA Audit Type:	☐ 2-Pillar ☐ 4-Pillar		
Date of Audit	20-21 August 2015		

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety, Environment and Business ethics. The SMETA Best Practice Guidance Version 5 December 2015 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
 - Management systems and code implementation,
 - 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 new ETI Working Hours Clause

Now integrated into this latest SMETA version.

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.





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Audit Company Name:	Report Owner (payee):
Intertek	YiWu EE JEWELERY CO., LTD.
Sedex Company Reference: (only available on Sedex System)	S: 000000065164
Sedex Site Reference: (only available on Sedex System)	P: 000000140592

Audit Conducted By				
Commercial		Purchaser		
NGO		Retailer		
Trade Union		Brand Owner		
Multi-stakeholder		Combined Audit (select all that apply)		
Auditor Reference Number: (If applicable)		Not applicable		

SMETA Declaration

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

Any exceptions to this must be recorded here (e.g. different sample size): None

Auditor Name(s) (please list all including all interviewers):

Lead auditor: Helin Zhao

Team auditor: Nil

Interviewers: Helin Zhao

Date: 20-21 August 2015



Non-Compliance Table

(Only check to		Area of Non–Conformity (Only check box when there is a non–conformity, and only in the box/es where the non–conformity can be found)			Record the number of issues by line*:		
			Local Law	Additional Elements (i.e. not part of ETI code)	NC	Obs	GE
0	Management systems and code implementation				0	0	0
1	Employment Freely Chosen				0	0	0
2	Freedom of Association				0	0	0
3	Safety and Hygienic Conditions	\boxtimes	\boxtimes		2	0	0
4	Child Labour				0	0	0
5	Wages and Benefits	\boxtimes	\boxtimes		1	0	0
6	Working Hours				0	0	0
7	<u>Discrimination</u>				0	0	0
8	Regular Employment				0	0	0
8A	Sub-Contracting and Homeworking				0	0	0
9	Harsh or Inhumane Treatment				0	0	0
10A	Entitlement to Work				0	0	0
10B2	Environment 2–Pillar				N/A	N/A	N/A
10B4	Environment 4–Pillar		\boxtimes	\boxtimes	3	0	0
10C	Business Ethics			\boxtimes		1	0

^{*}Please note the table above records the total number of Non compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.



Summary of Findings

Summary of main findings: (positive and negative) (Please give a short summary of the main findings per clause)

Site Summary

- The products manufactured at this site are Jewelries.
- Overall responsibility for meeting the standards is taken by the Ms. Shen Fangfang / Administration Supervisor
- There are a total of 52 workers (included 3 managers) on site (7 are Local employees and 45 are migrant employees); all of them are permanent workers).
- The youngest worker on site was 21 year old.
- There is no union but worker committee in the facility.
- There is evidence of both male and female in management and among supervisor. The distribution was Male 50%, Female 50%.
- The peak season in the site was not obvious.
- Site did not use any sub-contractor.
- 10 workers were selected for interview including 5 male and 5 female, they were interviewed as 1 group of 4 workers for group interview and 6 workers were interviewed individually. All workers said they were satisfied with their employment at the facility. They also said they were able to make suggestions to their supervisors and team leaders and sometimes they could use the suggestion box for suggestion.
- 12 months' payroll records from July 2014 to June 2015 and 13 months and 19 days' attendance records from 1 July 2014 to 19 August 2015 were provided for review during this audit. 10 samples from June 2015 (current month), 10 samples from January 2015 (random month) and 10 samples from November 2014 (random month) were selected in this audit.
- Based on the provided attendance records, standard working hours in this facility were 8 hours per day, 40 hours per week with at least 1 day off in a week.
- Based on the provided records, employees' wages were calculated based on hourly rate. All the employees
 were paid above the minimum wage; the lowest minimum wage is RMB 10.34 per hour which is higher than
 the local minimum wages RMB 8.45 per hour.
- Based on the provided attendance records and payrolls, overtime working was paid correctly, 150% and 200% of normal rate for overtime on normal workdays and rest days; no work was arranged on holidays.
- Insufficient social insurance participated. Through reviewing the payment receipts of social insurance in July 2015, total 52 employees should participate in social insurance in July 2015, but only 17 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance and employment injury insurance. Furthermore, the rest 35 employees who had not participated in any social insurance had participated in commercial injury insurance.
- Based on the provided attendance records, the status of overtime hours in sample was as below:
 - 36 hours/month in May 2015 (current month)
 - 36 hours/month in April 2015 (random month)
 - 36 hours/month in November 2014 (random month)

Issues Found NC's

3

- 3.1 The facility did not conduct evaluation on occupational hazard factors. During facility tour, auditor found that hazardous factors existed in paint spraying and sanding workshop. However, the facility could not provide evaluation report of occupational hazardous factors for review.
- 3.2 Malfunctioned firefighting equipment. During facility tour, auditor found that the pressure of 50% fire extinguisher in this facility were too high.



5.

5.1 Insufficient social insurance participated. Through reviewing the payment receipts of social insurance in July 2015, total 52 employees should participate in social insurance in July 2015, but only 17 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance and employment injury insurance. Furthermore, the rest 35 employees who had not participated in any social insurance had participated in commercial injury insurance.

10.B.4

10B4.1 No updated Environmental Impact Assessment (EIA) and approval for construction project. Auditors noted that no environmental impact assessment and approval of environmental impact assessment for processes newly added. During facility tour, auditor found that the facility had expanded spray painting process, the waste gas and hazardous waste which generated during manufacturing would cause certain influence on the environment. However, during document review, the facility has not obtained the environmental impact assessment and approval of environmental impact assessment for processes newly added.

10B4.2 No environmental protection acceptance checks report for completed construction project for processes newly added. During facility tour, auditor found that products in the facility are Jewelries, and the main processes are molding, paint spraying, sanding, assembling, inspection and packaging, the waste gas and hazardous waste which generated during manufacturing would cause certain influence on the environment. And the paint spraying process was a newly added process. However, during document review, the facility only obtained the environmental protection acceptance check approval for their construction project without paint spraying process, but has not obtained the environmental protection acceptance check approval for their construction project newly added with paint spraying process for review.

10B4.3 The facility did not perform monitoring tests for pollutants. During facility tour, auditor found that the wastewater and waste gas were generated from molding, paint spraying, sanding. However, the facility could not provide monitoring report of wastewater and waste gas for review.

Observation

10C

10C.1 No system in place to monitor their performance against Business Ethics Standards. From management interview and document review, there was no system in place to monitor their performance against Business Ethics Standards.

GE

None observed



Audit Details

Audit Details				
A: Report #:	SHCJ32715-02			
B: Time in and time out (SMETA BPG recommends 9.00-17.00 hrs. if any different please state why in the SMETA declaration)	Day 1 Time in: 9:20 Day 1 Time out: 17:30	Day 2 Time in: 8:30 Day 2 Time out: 12:30	Day 3 Time in: N/A Day 3 Time out: N/A	
C: Number of Auditor Days Used: (number of auditor x number of days)	1.5 Man-days (One aud	litor X1.5 man-days)		
D: Audit type:	☐ Full Initial ☑ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other - Defin	e		
E: Was the audit announced?	□ Announced □ Semi – announced: □ Unannounced	Window detail: weeks	S	
F: Was the Sedex SAQ available for review?	⊠ Yes □ No			
If No , why not? (Examples would be, site has not completed SAQ, site has not been asked to complete the SAQ.)	Not applicable			
G; Any conflicting information SAQ/Pre- Audit Info to Audit findings?	Yes No If Yes , please capture of 10.B.4	detail in appropriate audi	t by clause	
H: Auditor name(s) and role(s):	Helin Zhao/ Leader Aud	ditor and interviewer		
I: Report written by:	Helin Zhao/ Leader Auditor			
J: Report reviewed by:	Ferny Wang			
K: Report issue date:	28 August 2015			
L: Supplier name:	YiWu EE JEWELERY CO., LTD.			
M: Site name:	YiWu EE JEWELERY CO., LTD.			
N: Site country:	China			



O: Site contact and job title:	Ms. Shen Fangfang / Administration Supervisor				
P: Site address: (Please include full address)	No.5, Chuantang Road, Liu Qing Industrial Zone, Beiyuan Street, Yiwu City, Zhejiang Province, China				
Site phone:	86-13750966865	86-13750966865			
Site fax:	86-579-85112970)			
Site e-mail:	accounting2@ee	jewelry.cn			
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance		Yes Business license No. 330782000129762 Validity was from 22 October 2004 to 21 October 2054			
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Jewelries	Jewelries			
S: Audit results reviewed with site management?	Yes				
T: Who signed and agreed CAPR (Name and job title)	Ms. Shen Fangfang / Administration Supervisor				
U: Did the person who signed the CAPR have authority to implement changes?	Yes				
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	Ms. Shen Fangfang / Administration Supervisor, Mr. Xie Shengping / Sales Mr. Liang Zhong / Worker representative Helin Zhao/ Leader Auditor and interviewer				
W: What form of worker representation / union is there on site?	☐ Union (name) ☐ Worker Committee ☐ Other (specify) ☐ None				
X: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ☒ No				
Y: Previous audit date:	23-24 September, 2014				
Z: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other	
	Full Initial				
	Periodic				
	Full Follow-Up Audit				



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	Partial Follow- Up		
	Partial Other*		
	*If other, please of	define: N/A	



Audit Scope/Actual Results

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week and month)	Legal maximum: 8 hours per day, 40 hours per week	8 hours per day, 40 hours per week	Yes No N/A. No Collective Bargaining Agreement in the facility.
B: Legal Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week and month)	Legal maximum: Not exceed 3 hours per day and 36 hours per month	Daily overtime hours: 2 hour for 10 out of 10 samples in June 2015 (current month), January 2015 (random month) and November 2014 (random month). Monthly overtime hours: 36 hours/month in June 2015 (current month) 36 hours/month in January 2015 (random month) 36 hours/month in November 2014 (random month)	Yes No N/A. No Collective Bargaining Agreement in the facility.
C: Legal age of employment: (Minimum legal and actual minimum age at site)	Legal minimum: 16 years old	21 years old	
D: Legal minimum wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week and month)	Legal minimum: The local minimum wage standard was RMB 1470 per month equivalent to RMB 8.45 per hour (1470/21.75/8) after 1 August 2014, and RMB 1310 per month equivalent to RMB 7.53 per hour (1310/21.75/8) before 1 August 2014.	RMB 1800 per hour (RMB 10.34 per hour)	Yes No N/A. No Collective Bargaining Agreement in the facility.
E: Legal minimum overtime wage:	Legal minimum:	The facility paid 150%	Yes



(Minimum legal and actual minimum overtime wage at site, please state if possible per hr ,day, week and month)	1) No less than 150% of the normal wages for overtime working on normal weekdays; 2) No less than 200% of the normal wages for overtime working on rest day if no deferred rest can be taken; 3) No less than 300% of the normal wages for overtime working on statutory holidays.		No N/A. Collective Bargaining Agreement the facility.	No in
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Audit Scope (Please select the code and additional requirements that were audited against during this audit)		
2–Pillar Audit		
10B4: Environment 4–Pillar		
10C: Business Ethics		
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.		

Note: The main 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.

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

Audit Overview

Audit Overview		
	Management	Worker Representatives



Audit attendance	Senior manage	ement	Worker Comm		Union represe	entatives
A: Present at the opening meeting?	⊠ Yes	□No	⊠ Yes	□No	Yes	⊠ No
B: Present at the audit?	⊠ Yes	☐ No	⊠ Yes	□No	☐ Yes	⊠ No
C: Present at the closing meeting?	⊠ Yes	☐ No	⊠ Yes	□No	☐ Yes	⊠ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	Not applicable					
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	There was no	union in t	his facility			
F: Site description: (Include size, location and age of site. Also include structure and number of buildings)	YiWu EE JEWELERY CO., LTD. was located in No.5, Chuantang Ro Liu Qing Industrial Zone, Beiyuan Street, Yiwu City, Zhejiang Provin China. The total land area occupied was 1,200 square meters. facility has operated in the existing location since 2012. A total of 52 employees (including 3 managers) are currently working			Province, eters. The working in		
	the facility, which includes 43 production employees and 9 non-production employees (including 3 managers). 7 employees are local employees and 45 are migrant employees from other province of China, such as Guizhou, Yunnan, etc. All employees are hired by the facility directly.					
	All employees worked in one shift from 8:00 to 18:00 with 2 hours' lunch break from 12:00 to 14:00. Employees' wages are calculated on hourly basis and paid at 25 th of each month. The peak season is not obvious.			on hourly		
	With regards to building used dormitory nor of facility.	as offic canteen a	ce area, work	shops an	nd warehouses	s. Neither
	Production Building #1	<u> </u>	Description		Remark, if ar	ny
	Floor 1		Other facility		Size:1200 meters	square
	Floor 2		Other facility		Size:1200 meters	square
	Floor 3		Other facility		Size:1200 meters	square
	Floor 4		Workshop, warehouse a	nd office	Size:1200 meters	square
	Is this a building?	shared	Yes			
	Remark: All t	he areas	s used by the	audited	facility were	rent from



	landlord named Yiwu City Yuanguang Glasses Co., Ltd. and 1/F to 3/F of this building were used by another three facilities/compaies. 1/F of this building were used as warehouse by Zhejiagn Dahe Testing Co., Ltd Yiwu Branch and Gree Aire-condition Company, 2/F of this building was used by Tianyi Coating Film Factory, there were production of coating film product, 3/F of this building was used by Huaan Jewelery Factory, this factory also products jeweleries. The audited facility provided the least contract of audited facility, they could not provide other facilities' least contract and business license. The audit scope was only covered audited facility 4/F of this building. Auditor took a quick tour for 1/F to 3/F, and found many children and several workers looks very young stayed at 3/F Huaan Jewelery Factory.			
G: Site function:	☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor			
H: Month(s) of peak season: (if applicable)	Not obvious			
I: Process overview: (Include products being produced, main operation	ns, number of production lines, main equipment used)			
The products manufactured in this unit are jeweleries; The main production processes are listed as follows: Molding, paint spraying, sanding, assembly, inspection and packing. The main machine list of the facility is as following: Sanding machines: 2 sets, Molding machines: 1 set, packing machine: 2 sets, etc				
J: Attitude of workers: (Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk				
10 employees were selected for interview including 5 male and 5 female employees, they were interviewed as 1 group of 4 employees and 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.				
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 relationships with their supervisors and managers who treated them with respect.				
They were able to make suggestions to th suggestions used. They felt able to complain	eir supervisors and team leaders and sometimes they had seen these directly to their supervisors.			



K: Attitude of workers committee/union reps:

(Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Workers representative showed a positive attitude to this audit, he also showed that the employees were satisfied with their employment at the facility. No negative information was obtained from worker representative.

L: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

The facility management showed a positive attitude to this audit during the whole process. Locked areas encountered during the audit were unlocked timely. At the end of the audit, all the findings were accepted by the facility management.



Key Information

Key Information (click on the key information title to go to appropriate section of the report)					
A: Do all workers (including migrant workers) have contracts of employment/employment agreements? (Go to clause 8 – Regular Employment)	⊠ Yes □ No				
B: Are maximum standard/contracted working hours clearly defined in contract/employment agreements? (Go to clause 8 – Regular Employment)	⊠ Yes □ No				
C: Were appropriate records available to verify hours of work and wages? (Go to clause 5 – Living Wage)	⊠ Yes □ No				
D: Were any inconsistencies found? (if yes describe nature) (Go to Wages Table)	☐ Yes [☑ No [Poor record keeping Isolated incident Repeated occurrence			
E: For the lowest paid production workers, are wages paid for standard/contracted	Wages found:	Please indicate the breakdown of workforce according to earnings:			
hours (excluding overtime) below or above the legal minimum? (Go to clause 5 – Living Wage)	☐ Below legal min ☐ Meet ☑ Above	0% of workforce earning under min wage 0% of workforce earning min wage 100% of workforce earning above min wage			
F: % of piece rate workers: (if applicable)	Not applicable, all	employees (100%) were paid by hourly rate.			
G: Do the standard/contracted hours stated in a contract/employment agreement exceed the law or 48 hours per week? (Go to clause 6 – Working hours)	☐ Yes ☑ No The standard work for all employees.	king hours in labor contract were 40 hours per week			
H: If yes, what are the standard/contracted hours per week as stated in the contract/employment agreement? (Go to clause 6 – Working hours)	hrs/week	Approx% of ALL workers on these contacted hours N/A			
I: Combined hours (standard/contracted plus overtime = total hours) over 60 per week found? (Go to Working Hours Analysis)	☐ Yes ⊠ No				
J: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?					



K: Are the correct legal overtime premiums paid? (Go to Wages Table)	 ☐ Yes☐ No☐ N/A – there is no legal requirement to OT premium
L: Please state what actual OT is paid. (As a percentage of the workers standard rate) (Go to Working Hours Analysis)	Please give details of overtime premium as a % of standard wages: ☐ 0% ☐ 1% - 115% ☐ 116% - 124% ☑ 125% - 199% ☑ 200%+ Please give details: The facility paid 150% and 200% of normal rate for overtime on normal workdays and rest days respectively
M: Is there any night production work at the site?	☐ Yes ☑ No
N: % of workers living in site provided accommodation (if applicable):	0% No dormitory was available in the facility.
O: Age of youngest worker found: (Go to clause 4 – Child labour)	21 years old
P: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☐ No Not applicable
% of under 18's at this site (of total workers)	0 %
Q: What form of worker representation/union is there on site? (Go to clause 2 – Freedom of Association)	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None
R: Is it a legal requirement to have a union? (Go to clause 2 – Freedom of Association)	☐ Yes ☑ No
S: Is It a legal requirement to have a workers committee? (Go to clause 2 – Freedom of Association)	☐ Yes ☑ No
T: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) (Go to clause 2 – Freedom of Association)	 ☐ Yes☐ NoDescribe: Suggestion box, Verbal communication
U: Are there any External Processes? (Go to clause 8A – Sub–contracting and Home working)	☐ Sub-Contracting ☐ Homeworking ☐ Other External Process ☑ No external processes



Management Systems

	Management Systems:
A: Nationality of Management	China
B: Gender breakdown of Management + Supervisors (Include as one combined group)	Male:50 % Female50 %
C: Majority nationality of workers	Chinese
D: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	5%
E: Were accurate records shown at the first request?	⊠ Yes □ No
F: If No , why not?	N/A
G: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☐ No Please describe: There was no any fines/prosecution for non-compliance to any regulations.
H: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	 ∑ Yes ☐ No Please describe: The facility had established relevant policies about no discrimination, no harassment & abuse, no child labour, and no forced labour.
I: If Yes , is there evidence (an indication) of effective implementation? Please give details.	 The employee had been trained on no discrimination, no harassment & abuse policy and etc. when they hired. The training records were provided to review. During employee interview, they stat that they were aware of the policies.
J: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	 ∑ Yes ☐ No Please describe: The facility conducted training in the standards for forced labour, child labour, discrimination, harassment & abuse for the managers and employees once a year.
K: If Yes , is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	All interviewed employees stated they were provided training since they were recruited. Relevant training records were provided for review.
L: 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 3 rd party?	 ∑ Yes ☐ No Please describe: There is suggestion box for reporting grievances.



M: If Yes , are workers aware of these channels? Please give details.	Yes. From employee interview, they said they knew suggestion box.
N: Have health and safety risks been identified e.g. through internal audits, formal risk analysis process, worker involvement etc.?	 ✓ Yes ☐ No Please describe: Facility checked the production process and identify the health and safety risk.
O: If Yes , has effective action been taken to reduce or eliminate these risks?	Yes For the risks, action has been taken, such as personal protective equipment provided for employees, etc.
P: Are accidents recorded?	 ∑ Yes ☐ No Please describe: Accidents records were provided to review and it showed only 1 accident happened in past 12 months.
Q: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours?	∑ Yes ☐ No Please describe: production records such as daily production records, inspection records had been provided and after compared with attendance records, no inconsistency was found.
R: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes
S; Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	No
T: Is there a Human Resources manager/department? If Yes, please detail.	 ☐ Yes☐ NoPlease describe: Ms. Shen Fangfang



Worker Analysis

Worker Analysis								
		Local			Migrant			Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total
Worker numbers – male	2	0	0	21	0	0	0	23
Worker numbers – female	2	0	0	24	0	0	0	26
Total	4	0	0	45	0	0	0	49
Number of Workers interviewed	2	0	0	8	0	0	0	10

Contractors:

Yes	
A: Any contractors on site?	
B: If Yes , how many workers supplied by contractors	
C: Are all contractor workers paid according to law? Yes No N/A. No contractor on site.	
If Yes , Please give evidence for contractor workers being paid according to law:	

Migrant Workers:

(Please see SMETA Best Practice Guidance and Measurement Criteria for definitions of migrant workers)

D: Originating Locations/Countries:	Migrant workers are mainly from other Provinces such as Guizhou, Yunnan, etc.
E: Type of work undertaken by migrant workers :	All types of work in the facility include migrant workers.
F: Were migrant workers recruited through an agency?	☐ Yes ☑ No



If yes, please give details.	Please describe: Not applicable
If Yes , is there a contract with the agency? Provide details of agencies and contractual arrangements including any fees lodged during the recruitment process.	Not applicable
G: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No Please describe: Not applicable
H: Percentage of migrant workers in company provided accommodation:	N/A



Audit Results by Clause

0: Managements system and Code Implementation

(click here to return to NC Table)

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 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:

- 1. The facility implements and maintains systems for delivering compliance to this Code.
- 2. One senior manager is responsible for compliance with the Code. Ms. Shen Fangfang / Administration Supervisor
- 3. The facility communicates this Code to all employees by training as confirmed by training records and employee interviews.
- 4. The ETI based code was trained for employees.
- 5. The facility had set up policy and pointed one staff to update labour law requirements
- 6. Implementation of any necessary changes is then given to the individual department heads after agreement with the facility manager.
- 7. The facility had obtained ISO 9001:2008 certification.

- 1. Employee Handbook was reviewed. It stipulates complying with ETI Code, written policies and procedure that being provided individually to employees.
- 2. Company Manual contains details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client's requirement and local law.
- 3. Employees' training records showed the facility conducted training for employees about the social compliance when they enter the facility.

	Non-compliance:	
Description of non-compliance: NC against ETI/Additional Elements None observed	☐ NC against Local Law	Objective evidence observed: Not applicable
Local law and/or ETI requirement: Not applicable		
Recommended corrective action: Not applicable		



Observation:	
Description of observation: None observed	Objective evidence observed: Not applicable
Local law or ETI requirement: Not applicable	
Comments: Not applicable	

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable



1: Employment is Freely Chosen

(Click here to return to NC-table)

ETI

- 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 facility has a policy which prohibits forced labour and this was available for review.
- 2. The facility does not require deposit or withhold employees' ID cards but only copies must be kept in the personnel files and the original given back to the employees.
- 3. The employee handbook The facility does not limit the employees' freedom including resign. The handbook also states that they will be given their full wages on their last day of work.
- 4. The terms and conditions of employment in the handbook state that the employees are free to leave the workplace outside of their working hours.
- 5. The factory did not require any payment for work tools, PPE, IC/staff card, training, etc.
- 6. The factory did not use prison labour.
- 7. The above was confirmed in management and employee interview.

- 1. Personnel files (all were checked)
- 2. Resignation records of recent 12 months
- 3. Factory rules
- 4. Employee handbook
- 5. Management and employee interview

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law: None observed Local law and/or ETI requirement Not applicable Recommended corrective action:	Objective evidence observed: Not applicable
Not applicable	
Observation:	



Description of observation: None observed	Objective evidence observed: Not applicable
Local law or ETI requirement: Not applicable	
Comments: Not applicable	

Good Examples observed:	
Description of Good Example (GE): None observed	Objective evidence observed: Not applicable



2: Freedom of Association and Right to Collective Bargaining are Respected

(Click here to return to NC-table)
(Click here to return to Key Information)

ETI

- 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:

- 1. During document review and manager interview, auditor noted that there was no union exists in the facility, but the employees had selected 2 worker representatives.
- 2. During employee interview, they stated that they can raise their concerns through suggestion box and their team leader or above, and then the facility management will take correct action after discuss.

- 1. Employee and management interview
- 2. Employee handbook

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law None observed	Objective evidence observed: Not applicable
Local law and/or ETI requirement: Not applicable	
Recommended corrective action: Not applicable	
Observation:	
Description of observation: None observed	Objective evidence observed: Not applicable



Local law or ETI requirement: Not applicable		
Comments: Not applicable		
	-	г
A: Name of union and union representative, if applicable:	N/A	Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
B: If no union what is parallel means of consultation with workers e.g. worker committees?	Employees can raise their concerns through suggestion box and their team leader or above.	Is there evidence of free elections? ☐ Yes ☐ No ☐ N/A
C: Were worker representatives/union representatives interviewed	☐ Yes ☐ No If Yes , please state how many: One worker representative had been	en interviewed.
D: State any evidence that union/workers committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The meeting between management and worker representatives would be held on a regular basis, the recent meeting was held on 28 April 2015, and the topic was moistureproof of workshop.	
E: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ⊠ No	
F: If Yes what percentage by trade Union/worker representation	% workers covered by Union CBA Not applicable	% workers covered by Union CBA Not applicable
G: If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay	☐ Yes ☐ No Not applicable	
	Good Examples observed:	
Description of Good Example (GE): None observed		Objective evidence observed: Not applicable



3: Working Conditions are Safe and Hygienic

(Click here to return to NC-table)
(Click here to return to Key Information)

ETI

- 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:

- 1. General Health and Safety management
 - ESH team is responsible for the Health & Safety issues for the site.
 - 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 workers.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Minutes of meetings show that there are monthly meetings between the production employees and the management, and each point is acted on.

2. Fire Safety

- There were 2 exits for work area and these were clearly marked.
- Firefighting equipment was adequate and checks were up-to-date.
- Fire drills were organized and recorded every months of production area.
- 3. Electrical safety
 - All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - There were electricians at the site and his training certificate was available for review.
- 4. Chemical safety
 - All chemicals were correctly labelled.
 - Material Safety Data Sheets were available and there were hazard diagrams on any chemicals which needed careful handling.
 - Workers in the chemical store confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.
- 5. Medical services
 - There were adequate first aid kits in production area and they were well stocked.
 - There were 2 first aiders and when a selection was interviewed, they confirmed they had been trained at a local red cross institute.

Evidence examined - to support system description (Documents examined & relevant comments. Include



renewal/expiry date where appropriate):

- 1.Health and safety policy
- 2. Health and safety manual
- 3. Health and safety committee minutes
- 4. Training records and certificates
- 5. Fire drill records
- 6. Accident reports
- 7. Interviews with H&S manager
- 8. Interviews with employees and H&S committee members

Non-compliance:

1. Description of non-compliance:

The facility did not conduct evaluation on occupational hazard factors. During facility tour, auditor found that hazardous factors existed in paint spraying and sanding workshop. However, the facility could not provide evaluation report of occupational hazardous factors for review.

Local law and/or ETI requirement

Local law: In accordance with Provisions on the Supervision and Administration of Workplace Occupational Health Article 20, An employing entity with occupational hazards shall entrust an occupational health technical service agency with corresponding qualification to conduct evaluation on occupational hazard factors at least once every year. An employing entity with severe occupational hazards shall, in addition to the above requirement, entrusts an occupational health technical service agency with corresponding qualification to conduct assessment on occupational hazard status at least once every three years. The results of the evaluation and assessment shall be kept in archive, reported to local administration department of work safety, and announced to the workers.

ETI requirement: 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.

Recommended corrective action:

It is recommended that the facility should conduct evaluation on occupational hazards factors at least once a year, and keep the reports for review.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 30 Days

Verification method: Desktop

Objective evidence observed:

Facility tour and document review



2. Description of non-compliance:

Malfunctioned firefighting equipment. During facility tour, auditor found that the pressure of 50% fire extinguisher in this facility were too high.

Local law and/or ETI requirement

Local law: In accordance with PRC Fire Prevention Law article 16 (2), Government offices, social groups, enterprises, public institutions and other entities shall take the following fire safety precautions: Prepare fire protection facilities and equipment according to the national standards and industrial standards, set up fire safety signage, and conduct regular testing and maintenance so as to ensure they are in good condition and working order.

ETI requirement: 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.

Recommended corrective action:

It is recommended that the facility should conduct regular inspection so as to ensure the fire fighting equipments are in good condition.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 30 Days

Verification method: Desktop

Objective evidence observed:

Facility tour (NC Photo No.1)

Observation:	
Description of observation:	Objective evidence
None observed	observed: Not applicable
Local law or ETI requirement: Not applicable	τιοι αρμιισασίο
Recommended corrective action: Not applicable	

Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable



4: Child Labour Shall Not Be Used

(Click here to return to NC-table)
(Click here to return to Key Information)

ETI

- 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:

- 1. The facility had set up the policy of checking ages of employees at application stage, and this includes checking ID's. Once employees have joined their original ID's are copied and given back to them whilst copies only are kept in their personnel file.
- 2. Checks of all employees' files showed that the youngest employee present was age 21 years.
- 3. There was a note on young workers in the employee handbook detailing special employment conditions which included that by law young workers will be given a regular health check and will be registered with the local labour office. Through document review and employee interview, there was young worker in the facility.
- 4. Child labour policy was communicated to all employees during the refresh employee training.

- 1. Personnel files of all employees (see checks done for clause 1 'employment freely chosen')
- 2. Latest list of employees
- 3. Management and employee interview

Non-compliance:	
1. Description of non-compliance: NC against ETI NC against Local Law: None observed	Objective evidence observed: Not applicable
Local law and/or ETI requirement Not applicable	
Recommended corrective action: Not applicable	
Observation:	



Description of observation: None observed	Objective evidence observed: Not applicable
Local law or ETI requirement: Not applicable	.,
Comments: Not applicable	

Good Examples observed:	
None observed	Objective Evidence Observed: Not applicable



5: Living Wages are Paid

(Click here to return to NC-table)
(Click here to return to Key information)

ETI

- 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:

- 1. The local minimum wage standard was RMB 1470 per month equivalent to RMB 8.45 per hour (1470/21.75/8) after 1 August 2014, and RMB 1310 per month equivalent to RMB 7.53 per hour (1310/21.75/8) before 1 August 2014.
- 2. All employees' wages were calculated by hourly rate. Based on provided payroll records, the minimum wage paid by the facility was RMB 1800 per month (RMB 10.34 per hour).
- 3. Based on provided records, all employees were paid corrected for their overtime wages, 150% and 200% of normal wage rate was paid for overtime work in normal days and rest days respectively.
- 4. 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.
- 5. Through reviewing the payment receipts of social insurance in July 2015, total 52 employees should participate in social insurance in July 2015, but only 17 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance and employment injury insurance.
- 6. Benefits of paid annual leave were given to all employees and child-bearing leave to appropriate employees.
- 7. All employees were paid on the 25th of each month by cash. Wage slip was given to employees.
- 8. Through document review and facility tour, no inconsistent was found between information from employee interview and provided attendance records.

- 1. Document review
- 2. Employee interview
- 3. Local and national laws
- 4. Wages and benefits policy
- 5. Local legal minimum wage documents
- 6. Payroll records from July 2014 to June 2015 and attendance records from 1 July 2014 to 19 August 2015 were reviewed.
- 7. Leave records
- 8. Social insurance and payment receipts from the local labour department



- 9. Labour contracts for all employees (to examine agreed wage rates)
- 10. Resignation records
- 11. Hours records to check hourly rates and any overtime premiums

Non-compliance:

1. Description of non-compliance:

Insufficient social insurance participated. Through reviewing the payment receipts of social insurance in July 2015, total 52 employees should participate in social insurance in July 2015, but only 17 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance and employment injury insurance. Furthermore, the rest 35 employees who had not participated in any social insurance had participated in commercial injury insurance.

Local law and/or ETI requirement:

Local Law: In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.

ETI 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.

Recommended corrective action:

It is recommended that the facility should ensure all employees participate in social insurance according to the Law.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 60 Days

Verification method: Follow Up

Objective evidence observed:

(where relevant please add photo numbers)

Social insurance and payment receipts, through documents review and employees interview.

Observation:

Description of observation:

None observed

Local law or ETI requirement:

Objective evidence observed:

Not applicable



Not applicable							
Comments: Not applicable							
Good Examples observed:							
Description of Good Example (GE): None observed					Objective Evidence Observed: Not applicable		
Wages analysis: (Click here to return to Key Information)							
A: 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 for June 2015 (current month) 10 samples for January 2015 (random month) 10 samples for November 2014 (random month)					
B: Are there different legal minimum wage grades? If Yes , please specify all.		☐ Yes ☐ If Yes , please give		If Yes , please give de	etails: N/A		
C: If there are different legal minimum grades, are all workers graded correctly?		☐ Yes ☐ No ☑ N/A		If No , please give details: N/A			
D: What deductions are required by law e.g. social insurance? Please state all types:		Social insurance, tax and etc.					
E: Have all of these deductions been made? Please list all deductions that have/have not been made.		☐ Yes ⊠ No		If Yes , Please list all deductions that have been made: N/A			
				If No , please give details on any deductions which have not been made: The facility had paid the Social insurance for employees, tax had been made by employees.			
F: Industry norm for this region: (please include time period e.g. hour/week/month)		Not applicable					
Wages table (Click here to return to Key information)							
Worker Type	Process Operato (Lowest paid)			ess Operator rage paid)	Process Operator (Highest paid)		
Select from individual work boxes. Ensure comparisor							



Practice Guidance and Measurement Criteria for completing this:							
A: Pay period: (State month selected)	June 2015	June 2015	June 2015				
B: Anonymous Employee Reference/Dept.	Employee A / Packing workshop	Employee B / Sample making workshop	Employee C / Developing workshop				
C: Employee Gender	Male	Male	Male				
D: Contracted/Standard working hours: (excluding OT – please include time period e.g. hour/week/month)	160 hours/month	168 hours/month	168 hours/month				
E: Contracted /Standard work pay rate: (excluding OT – please include time period e.g. hour/week/month)	RMB 1800 per month (RMB 10.34 per hour)	RMB 1900 per month (RMB 10.92 per hour)	RMB 2000 per month (RMB 11.49 per hour)				
F: Standard day overtime – hours: (please include time period e.g. hour/week/month)	12 hour this month	12 hour this month	12 hour this month				
G: Standard day overtime – wage: (please include time period e.g. hour/week/month)	RMB 186.2 this month	RMB 196.56 this month	RMB 206.82 this month				
H: Rest day overtime – hours: (please include time period e.g. hour/week/month)	24 hour this month	24 hour this month	24 hour this month				
I: Rest day overtime – wage: (please include time period e.g. hour/week/month)	RMB496.5 this month	RMB524.16 this month	RMB551.52 this month				
J: Statutory Holiday overtime – hours: (please include time period e.g. hour/week/month)	0 hour this month	0 hour this month	0 hour this month				
K: Statutory holiday OT – wages: (please include time period e.g. hour/week/month)	RMB 0 this month	RMB 0 this month	RMB 0 this month				
L: Total overtime hours: (please include time period e.g. hour/week/month)	36 hours this month	36 hours this month	38 hours this month				
M: Incentives/Bonus/	RMB 82.8 this month	RMB 87.4 this month	RMB 92 this month				



Allowances etc.: (please include time period e.g. hour/week/month)	(Holiday wage)		(Holiday wage)	(Holiday wage)			
N: Gross wages: (please include time period e.g. hour/week/month)	RMB 2420.7 this month		RMB 2642.7 this month	RMB 2781.6 this month			
O: Social insurance and other deductions; please list which and amount.	RMB 0 this month		RMB 0 this month	RMB 0 this month			
P: Actual wage paid after deduction: (please include time period e.g. hour/week/month)	RMB 2420.7 this month		RMB 2642.7 this month	RMB 2781.6 this month			
Comments: (Please state here any specific reasons/circumstances that explain the lowest and highest gross wages)							
Remark: The above analysis was based on the provided payroll records of June 2015 (current month).							
Q: Is there a defined living way This is <u>not normally</u> minimum is wage. If answered Yes please amount and source of info: Please see SMETA Best Practic Guidance and Measurement Crite	legal [] state F	☐ Yes ☐ No Please specify amount/time period: Not applicable					
R: Are workers paid in a timely manner in line with local law?		✓ Yes. All workers are paid at the 25th of the month.✓ No					
		☐ Cash ☐ Cheque ☐ Bank Transfer ☐ Other If other explain: N/A					



6: Working Hours are not Excessive

(Click here to return to NC-table)
(Click here to return to Key Information)

ETI

- 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 <u>all</u> of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 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:

- 1. Through employees' interview, overtime is voluntary.
- 2. The facility used finger print electrical attendance system to keep all employees working hours and then based on the attendance records to calculate wages.
- 3. According to provided attendance records and employee interview, basic working hours were 8 hours per day and 40 hours per week with no more than 3 hours overtime per day on weekdays. No overtime work on public holidays was arranged for employees.
- 4. Based on the attendance records provided by the facility:
- 1) For June 2015 (current month), the average number of hours worked in a week for the 10 randomly selected samples were 47.4 hours per week. The maximum working hours per week were 52 hours (10 out of 10 randomly selected samples). The maximum monthly overtime hours were 36 hours (10 out of 10 randomly selected samples).
- 2) For January 2015 (random month), the average number of hours worked in a week for the 10 randomly selected samples were 46.1 hours per week. The maximum working hours per week were 52 hours (10 out of 10 randomly selected samples). The maximum monthly overtime hours were 36 hours (10 out of 10 randomly selected



samples).

- 3) For November 2014 (random month), the average number of hours worked in a week for the 10 randomly selected samples were 45.7 hours per week. The maximum working hours per week were 52 hours (10 out of 10 randomly selected samples). The maximum monthly overtime hours were 36 hours (10 out of 10 randomly selected samples).
- 5. In this audit, production records such as inspection records, in and output records and daily production records were recorded and provided for review. All payroll records and attendance records required were provided by the facility timely. From crosschecking production records and attendance records, no inconsistencies were noted. In addition, through employee interview, no inconsistence was noted.

- 1.Employee interview
- 2. Management interview
- 3. Local and national laws
- 4. Facility policy on working hours
- 5. Time records in electronic keeping system
- 6. Sample pay slips with recorded hours all employees interviewed
- 7. Employees contracts
- 8. Attendance records from 1 July 2014 to 19 August 2015 were reviewed.
- 9. Quality and production records to cross check hours

Non-compliance:			
1. Description of non-compliance: No against ETI NC against Local Law: None observed	Objective evidence observed: Not applicable		
Local law and/or ETI requirement Not applicable			
Recommended corrective action: Not applicable			
Observation:			
Description of observation: None observed	Objective evidence observed:		
Local law or ETI requirement: Not applicable	Not applicable		
Comments: Not applicable			
Good Examples observed:			
Description of Good Example (GE):	Objective Evidence		



None observed	Observed: Not applicable

Working hours analysis Please include time period e.g. hour/week/month (Go back to Key information)							
Systems & Processes							
A. What timekeeping systems are used: time card etc.	Describe: Finger	r print Elect	rical attendance s	ystem			
B: Sample Size Checked (State number of worker records checked and from which weeks/months and type – should be current, peak and random/low: See SMETA Best Practice Guidance and Measurement Criteria)	10 samples for June 2015 (current month) 10 samples for January 2015 (random month) 10 samples for November 2014 (random month)						
C: Do ALL workers have contracts/employment agreements?	⊠ Yes □ No						
		Not applicable					
D: Are standard/contracted working hours defined in all contracts/employment agreements?	⊠ Yes □ No	If NO, please state which type of workers do NOT have standard hours defined in contracts/employment agreements.					
	Not applicable						
E: Are there any other types of	☐ Yes ⊠ No	If YES, Please complete as appropriate:					
contracts/employment agreements used?		0 hrs	☐ Part time	☐ Variable hrs	☐ Other		
		If "Other", Please define:					
		Not applicable					
Standard/Contracted Hours work	ked						
F: Do standard/contracted standard hours ever exceed the law <i>or</i> 48 hours per week?	☐ Yes			parison (local law/-	48 hrs		
nours per week:		Not applicable					
G: What are the actual standard/contracted hours worked in	Highest hours:	40 hours per week					
sample (State per week/month)	Lowest hours:	40 hours p	40 hours per week				



H: Any local waivers/local law or permissions which allow	☐ Yes ☐ No If YES, Please give details N/A			
averaging/annualised hours for this site?				
Overtime Hours	vertime Hours			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	36 hours per month in June 2015 (current month) 36 hours per month in January 2015 (random month) 36 hour per month in November 2014 (random month)		
		12 hours per week in June 2015 (current month) 12 hours per week in January 2015 (random month) 12 hour per week in November 2014 (random month)		
		2 hours per day in June 2015 (current month) 2 hours per day in January 2015 (random month) 2 hour per day in November 2014 (random month)		
	Lowest OT hours: 36 hours per month in June 2015 (current month) 36 hours per month in January 2015 (random month) 36 hour per month in November 2014 (random month)			
		0 hours per week in June 2015 (current month) 0 hours per week in January 2015 (random month) 0 hour per week in November 2014 (random month)		
		0 hours per day in June 2015 (current month) 0 hours per day in January 2015 (random month) 0 hour per day in November 2014 (random month)		
J: Range of overtime hours over all workers/or as large a sample as possible. (State per week/month and	36 hours per month in June 2015 (current month) 36 hours per month in January 2015 (random month) 36 hour per month in November 2014 (random month)			
details)	0 to 12 hours per week in June 2015 (current month) 0 to 12 hours per week in January 2015 (random month) 0 to 12 hours per week in November 2014 (random month)			
	0 to 2 hours per day in June 2015 (current month) 0 to 2 hours per day in January 2015 (random month) 0 to 2 hours per day in November 2014 (random month)			
K: Approximate percentage of workers on highest overtime hours	100%			
L: Is overtime voluntary?		Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:		
	miomation	During employee interview, all the employees stated that overtime is voluntary.		



Overtime Premiums							
M: Is overtime paid at a premium?	⊠ Yes □ No	Please give details of normal day overtime premium as a % of standard wages:					um as
		0%	□ 1 – 115%	116 – 124%	125 – 149%	⊠ 150 – 199%	⊠ 200%+
		normal i	rate for o	vertime or	cility paid n normal on holiday	workdays	
N: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium and this is allowed under local law, are there other	□ No □ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) □ Collective Bargaining agreements □ Other Not applicable				ge, with		
considerations? Please complete the boxes where relevant. Multi select is possible.	Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.					idated	
	Not applicable. The facility paid 150% and 200% of normal rate for overtime on normal workdays and rest days; no work was arranged on holidays.						
Rest Days							
O: Are workers provided with 1 day off in every 7–day–period, or 2 in 14–day–period (where the law allows)?	⊠ Yes □ No	Maximum number of days worked without a day off (in sample):				off (in	
day period (where the law allows).		6					
Total Hours							
P: Range of total hours: (Quote highest and lowest please include time period e.g. hour/week/month)	Highest total hours	month) = 168+36 month)= 160+36	= 204 hour (OT) hour 204 hours	s s per mor urs per	onth in J nth in Janu month in	uary 2015	(random
	Lowest total hours	month) = 168+36 month)= 160+36	= 196 hour (OT) hour 204 hours	s per mor	onth in J	uary 2015	(random
R: If more than 60 total hours per week and this is legally allowed, are	Overtime is Onsite Collect			ws 60+ ho	urs/week		



there other considerations? Please complete the boxes where relevant. Multi select is possible.	☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons Not applicable. Maximum weekly working hours were 52 hours		
	Please explain any checked boxes in R above		
	Not applicable Based on the attendance records, auditor noted that the maximum weekly working hours were 52 hours.		
Comments: (please state here any specific reasons/circ	cumstances that explain the highest working hours)		
Please add details of examples where the site has demonstrated "exceptional circumstances". N/A			
Please give details of any appropriate safeguards in place at the time of the 60+ hours working. N/A			
Any other comments: None			



7: No Discrimination is Practiced

(Click here to return to NC-table)

ETI

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:

- 1. As informed by interviewed employees, most employees spoke highly of the facility owner.
- 2. No employee was required to do the examination of the hepatitis B virus and HIV.
- 3. Anti-discrimination procedure on hiring, compensation, promotion and access to training is available during the audit.
- 4. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
- 5. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- 6. There was no evidence of sexual harassment.
- 7. No any documents show any differential treatment to different workers, constituting discriminating.

- 1. The hiring and termination procedure, leave application records and employee handbook.
- 2. Payrolls
- 3. Attendance records
- 4. Termination records
- 5. Training records
- 6. Employee interview

Non-compliance:			
1. Description of non-compliance: NC against ETI NC against Local Law None observed	Objective evidence observed: Not applicable		
Local law or ETI requirement: Not applicable			
Recommended corrective action: Not applicable			
Observation:			



Description of observation: None observed	Objective evidence observed: Not applicable
Local law or ETI requirement: Not applicable	.,
Comments: Not applicable	

Good Examples observed:	
None observed	Objective Evidence Observed: Not applicable



8: Regular Employment Is Provided

(Click here to return to NC-table)
(Click here to return to Key Information)

ETI

- 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.

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. All 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.
- 2. No subcontractor was used.

- 1. The hiring and termination practices
- 2. Personal files
- 3. Payroll records were provided for review.
- 4. Employee interview

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law None observed Local law or ETI requirement:	Objective evidence observed: Not applicable	
Not applicable		
Recommended corrective action: Not applicable		
Observation:		
Description of observation: None observed	Objective evidence observed: Not applicable	



Local law or ETI requirement: Not applicable	
Comments: Not applicable	
Good Examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable



8A: Sub-Contracting and Homeworking

(Click here to return to NC-table)
(Click here to return to Key Information)

8A.1. There should be no sub-contracting unless previously agreed with the main client.

8A.2. Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

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. A site tour showed that all production processes were present in the unit, no subcontracting or homeworking used by the facility and all processes were conducted in the facility.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- 1. Production record was provided for review and there was no sign of subcontracting or homeworking.
- 2. Factory Tour
- 3. Management interview

Description of observation:

Local law or ETI/Additional elements requirement:

None observed

Not applicable

4. Employee interview

Non-compliance:			
1. Description of non-compliance: NC against ETI/Additional Elements None observed NC against Local Law	Objective evidence observed: Not applicable		
Local law and/or ETI /Additional Elements requirement: Not applicable			
Recommended corrective action: Not applicable			
Observation:			

	7
46	
	4

Objective evidence

observed:Not applicable



Comments: Not applicable		
Good Examples observed:		
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable	



Summary of sub-contracting – if applicable			
A: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No If Yes , summarise details: Not applicable. No sub-contractor used by the facility.		
B: Number of sub- contractors/agents used	0		
C: Is there a site policy on sub- contracting?	☐ Yes ☐ No If Yes , summarise details: Not applicable		
D: What checks are in place to ensure no child labour is being used and work is safe?	Not applicable. No sub-contractor used by the facility.		
E: What processes are sub-contracted?	Not applicable. No sub-contractor used by the facility.		
Su	mmary of homeworking	- if applicable	
F: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes☐ No If Yes , summarise details: Not applicable. No homeworking is being used		
G: Number of homeworkers	Male: 0	Male: 0	Male: 0
H: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents Not applicable		
I: If through agents, number of agents	Not applicable		
J: Is there a site policy on homeworking?	☐ Yes ☑ No		
K: How does site ensure worker hours and pay meet local laws for homeworkers?	Not applicable		
L: What processes are carried out by homeworkers?	Not applicable		
M: Are written agreements in place for homeworkers that include regular employment?	☐ Yes ☐ No Not applicable		



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N: Are full records available at the site?	☐ Yes ☐ No Not applicable



9: No Harsh or Inhumane Treatment is Allowed

(Click here to return to NC-table)

ETI

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.

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. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure
- 2. As per management interview, document review and employee interview, there was a policy on Harsh Treatment.
- 3. There is an internal process for grievance, which is an anonymous email address, where employees can report any grievances (harassment, bullying, discrimination etc.), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system.

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

Non-compliance:		
1. Description of non-compliance: NC against ETI NC against Local Law None observed	Objective evidence observed: Not applicable	
Local law and/or ETI requirement: Not applicable		
Recommended corrective action: Not applicable		
Observation:		
Description of observation: None observed	Objective evidence observed: Not applicable	

Not applicable



Local law or ETI requirement: Not applicable		
Comments: Not applicable		
	·	
Good Examples observed:		
Description of Good Example (GE): None observed	Objective Evidence Observed:	



10. Other Issue areas: 10 A: Entitlement to Work and Immigration

(Click here to return to NC-table)

Additional Elements

- 10A1 Only workers with a legal right to work shall be employed or used by the supplier.
- 10A2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.
- 10A3 Employment agencies must only supply workers registered with them.
- 10A4 The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

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, 7 employees were local and 45 employees were migrant from other province of China. The youngest age was 21 years old. All of employees were recruited directly by the facility and no agency was involved in facility's recruitment processes.
- 2. No agency staff or foreign employee was used by the facility.

- 1. Hiring procedure
- 2. Personnel files
- 3. Employee handbook
- 4. Employee interview

Non-compliance:		
Description of non-compliance: NC against ETI/Additional Elements None observed	☐ NC against Local Law	Objective evidence observed: Not applicable
Local law and/or ETI /Additional Elements Not applicable	requirement:	
Recommended corrective action: Not applicable		
Observation:		



None observed	Objective evidence observed: Not applicable
Local law or ETI/Additional Elements requirement: Not applicable	
Comments: Not applicable	

Good examples observed:	
None observed	Objective Evidence Observed: Not applicable



10. Other issue areas 10B4: Environment 4-Pillar

(Click here to return to NC-table)

To be completed for a 4-Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

- 10B4.1 Suppliers as a minimum must meet the requirements of local and national laws related to environmental standards.
- 10B4.2.Where it is a legal requirement, suppliers must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
- 10B4.3. The supplier shall be aware of their end client's environmental standards/code requirements and have a system in place to monitor their performance against these.

B4. Guidance for Observations

- 10B4.4. Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
- 10B4.5. Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
- 10B4.6. Suppliers shall be aware of the significant environmental impact of their site and its processes.
- 10B4.7. 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).
- 10B4.8. Suppliers shall seek to make continuous improvements in their environmental performance.
- 10B4.9. Suppliers shall have available for review any environmental certifications or any environmental management systems documentation
- 10B4.10. Suppliers should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.
- 10B.4.11. 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. One senior manager was responsible for continuous improvements in their environmental performance.
- 2. The facility did not obtain EIA document and EIA approval for added construction project for review.
- 3. The facility conducted training for all employees on the avoidance of environmental impact.
- 4. The facility had provided SAQ for review.
- 5. The facility was aware of the significant environmental impact of their site and its processes.
- 6. The facility had established the environmental protection system yet.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Energy bills

Water bill

Worker and management interview.

Site tour



Non-compliance:

1. Description of non-compliance:

No updated Environmental Impact Assessment (EIA) and approval for construction project. Auditors noted that no environmental impact assessment and approval of environmental impact assessment for processes newly added. During facility tour, auditor found that the facility had expanded spray painting process, the waste gas and hazardous waste which generated during manufacturing would cause certain influence on the environment. However, during document review, the facility has not obtained the environmental impact assessment and approval of environmental impact assessment for processes newly added.

Local law and/or ETI requirement

Local law: In accordance with The PRC Environmental Impact Assessment Law article 24, after the approval of the construction projects' Environmental Impact Assessment Documents, in case of any changes in the nature, scale, site, production process or measures of preventing pollution and ecological damage, construction units concerned shall re-submit the construction projects' Environmental Impact Assessment Documents for the application.

In accordance with The PRC Environmental Impact Assessment Law article 22, the construction unit shall submit the Environmental Impact Assessment documents of the construction project to the authorized environmental protection administrative department in charge in accordance with the regulations of the State Council for examination and approval. For those administrated by the trade's administrative department, the environmental impact report or the environmental impact report form shall be submitted to the authorized environmental protection administrative department for examination and approval after pre-examination by the trade's administrative department in charge.

ETI: 10B4.1 Suppliers as a minimum must meet the requirements of local and national laws related to environmental standards.

Recommended corrective action:

It is recommended that the facility should compile EIA document and approval as per legal requirement.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 60 Days

Verification method: Desktop

Objective evidence observed:

Document review



2. Description of non-compliance:

No environmental protection acceptance checks report for completed construction project for processes newly added. During facility tour, auditor found that products in the facility are Jewelries, and the main processes are molding, paint spraying, sanding, assembling, inspection and packaging, the waste gas and hazardous waste which generated during manufacturing would cause certain influence on the environment. And the paint spraying process was a newly added process. However, during document review, the facility only obtained the environmental protection acceptance check approval for their construction project without paint spraying process, but has not obtained the environmental protection acceptance check approval for their construction project newly added with paint spraying process for review.

Local law and/or ETI requirement

Local law: In accordance with the Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project article 17, For construction units accord with the acceptance check conditions prescribed in Article 16, competent departments of environmental protection administration shall approve the application report of environmental protection acceptance check, application form of environmental protection acceptance check or registration card of environmental protection acceptance check. For construction projects with a registration card of environmental protection acceptance check upon completion of project completed, competent departments of environmental protection administration shall, after checking, give the opinions on the registration card of environmental protection acceptance check and make approval decisions. Construction projects without official approval on the application report, application form or registration card of environmental protection acceptance check upon completion of projects shall not be put into production or use.

ETI: 10B4.1 Suppliers as a minimum must meet the requirements of local and national laws related to environmental standards.

Recommended corrective action:

It is recommended that the facility should apply the environmental protection acceptance check for their added construction project as per legal requirement.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 60 Days

Verification method: Desktop

Objective evidence observed:

Document review



3. Description of non-compliance:

The facility did not perform monitoring tests for pollutants. During facility tour, auditor found that the wastewater and waste gas were generated from molding, paint spraying, sanding. However, the facility could not provide monitoring report of wastewater and waste gas for review.

Local law and/or ETI requirement

Local law: In accordance with Measures for the Administration of Environmental Surveillance Article 21 A discharging unit shall self-monitor the situation of pollutant discharge according to the requirements of environmental protection departments above county level and the technical manual of state environmental surveillance. If a discharging unit, conforming to technical manual of state environmental surveillance, is inspected by the environmental surveillance institution under the environmental protection department above county level to meet the requirements on capability and technical conditions, its surveillance data can be used as the basis for identification of the varieties and quantities of pollutants discharged. A discharge unit, without ability for environmental surveillance, shall commission an environmental surveillance institution under the environmental protection department or environmental surveillance institution identified by the environmental protection department at provincial level for surveillance; expenditure of the surveillance performed by an environmental surveillance institution after accepting the commission should be borne by the commissioning party, in accordance with the relevant state regulations. An environmental surveillance institution identified by the environmental protection department at provincial level refers to an institution engaged in environmental surveillance but not under an environmental protection department, which can voluntarily apply to an environmental protection department at provincial level of the locality for the identification that it obtains the appropriate capability of environmental surveillance; if recognized to be qualified, the institution can be regarded as an environmental surveillance institution identified by the environmental protection department at provincial level. An environmental surveillance institution identified by the environmental protection department at provincial level should accept supervision and inspection by the environmental surveillance institution under the environmental protection department of the locality.

ETI: 10B4.1 Suppliers as a minimum must meet the requirements of local and national laws related to environmental standards.

Recommended corrective action:

It is recommended that the facility should perform monitoring tests for its pollutants regularly.

Action by: Ms. Shen Fangfang / Administration Supervisor

Recommended completion timescale: 60 Days

Verification method: Desktop

Objective evidence observed:

Document review

Observation:		
Description of observation: None observed	Objective evidence observed: Not applicable	
Local law or ETI requirement:	Not applicable	



Not applicable	
Recommended corrective action: Not applicable	

Good examples observed:	
Description of Good Example (GE): None observed	Objective Evidence Observed: Not applicable



Environmental Analysis (Site declaration only – this has not been verified by auditor. Please state units in all cases below.)			
A; Responsible for Environmental issue Position):	es (Name and	Ms. Shen Fangfan	g / Administration Supervisor
B: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail.		☐ Yes ☒ No Details: Not applica	able
C: Does the site have an Environmental policy? (For guidance, please see Measurement criteria)		⊠ Yes □ No	
Does the site have a Biodiversity policy? (For guidance, please see Measurement criteria)		☐ Yes ⊠ No	
E: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please detail. (For guidance, please see Measurement criteria)		☐ Yes ⊠ No Details: Not applica	able
F: Have all legally required permits been Please detail.	en shown?	☐ Yes ☒ No Details: No EIA do construction projec	ocument and EIA approval for added
G: Is there a documentation process to hazardous chemicals used in the manu process?			N/A lity had established documentation cal used in this facility.
H: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?		∑ Yes	ty collected such requirement of the
	Usage/Disch	arge analysis	
Criteria	Current year: Ple Jan – Dec 2014	ease state period:	Previous Year: Please state period: Jan – Dec 2013
Electricity Usage: Kw/hrs	63,858 KW		51,919 KWh
Renewable Energy Usage: Kw/hrs	None		None
Gas Usage: Kw/hrs	160 tons		100 tons
Has site completed any carbon Footprint Analysis?	☐ Yes ⊠ No		☐ Yes ⊠ No



If Yes, please state result	N/A	N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	Local water authority	Local water authority
Water Volume Used: (m³)	5,137 m³	4,035 m³
Water Discharged: Please list all receiving waters/recipients.	Municipal sewage	Municipal sewage
Water Volume Discharged: (m³)	3,079 m³	2,883 m³
Water Volume Recycled: (m³)	1290m³	1100 m³
Total waste Produced (please state units)	3.8 tons	3.6 tons
Total hazardous waste Produced: (please state units)	0.02 tons	0.01 tons
Waste to Recycling: (please state units)	0	0
Waste to Landfill: (please state units)	0	0
Total Product Produced (please state units)	360,000 pieces	6,000,000 pieces



10C: Business Ethics - 4-Pillar Audit

(Click here to return to NC-table)

To be completed for a 4-Pillar SMETA Audit

10C. Guidance for "Observations"

- 10C.1. Suppliers should have completed the appropriate section of the SAQ and have made it available to the auditor.
- 10C.2. The supplier should have received and acknowledged—preferably in writing the Business Ethics policy of the auditor/audit company.
- 10C.3. Suppliers shall seek to conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
- 10C.4. Suppliers shall be aware of any applicable laws, their end client's Business Ethics standards/code requirements and have a system in place to monitor their performance against these.
- 10C.5. Supplier should have a Business Ethics policy concerning bribery, corruption, or unethical Business Practice. This should be clearly communicated to all relevant parties.
- 10C.6. Suppliers should have a designated person responsible for implementing standards concerning Business Ethics
- 10C.7. Suppliers should have a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter
- 10C.8. 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.

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 and the main requirement is to gather information on the relevant Business Ethics issues in a supply chain. All findings will be recorded as observations not Non– Compliances and the data collected will allow the membership to define appropriate standards over time as part of a continuous review process.

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 had completed SAQ.
- 2. Facility had established Business Ethics policy concerning bribery, corruption, or unethical Business Practice. This should be clearly communicated to all relevant parties.
- 3. Ms. Shen Fangfang / Administration Supervisor is responsible for implementing standards concerning Business Ethics.
- 4. The facility did not establish the business ethics system yet.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Business Ethics policy Management interview Employee interview

Observation



Description of observation:

No system in place to monitor their performance against Business Ethics Standards. From management interview and document review, there was no system in place to monitor their performance against Business Ethics Standards.

Local law or ETI/Additional elements requirements:

In accordance with requirement of Business Ethics 10C.4. Suppliers shall be aware of any applicable laws, their end client's Business Ethics standards/code requirements and have a system in place to monitor their performance against these.

Comments:

Facility management explained they did not know the requirement and would establish system in place to monitor their performance against Business Ethics Standards

Objective evidence observed:

Document review and management interview

Good examples observed:	
Description of Good Example (GE):	Objective Evidence
None observed	Observed:



Worker Interview Summary

Worker Interview Summary		
A: Were workers aware of the audit?	⊠ Yes □ No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria)	1 group of 4 employees	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 3	Female: 3
E: Total number of interviewed workers (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 5	Female: 5
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	□ Favourable □ Non–favourable □ Indifferent	
H: What was the most common worker complaint?	None observed	
I: What did the workers like the most about working at this site?	Payment on time The facility management was kind to twas satisfactory.	them and the working environment
J: Any additional comment(s) regarding interviews:	Most employees enjoyed working at the work and had a good relationship with	his facility, they felt they had sufficient management in general
K: Attitude of workers to hours worked:	They stated that the overtime work was the working hours.	as voluntarily and the satisfactory with
Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site)		
A: Number of agencies used (average):	Not applicable And names if available:	

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B: Were agency workers' age/pay/hours included within scope of this audit	☐ Yes ☐ No Not applicable
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No Not applicable



Other findings

Other Findings Outside the Scope of the Code

None observed

Community Benefits

(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)

None observed



Photo Form



NC Photo No.1: fire extinguishers' pressure were high



Facility name



Facility address name and other facility name



Facility building



Exit sign and emergency light



Fire extinguishers



Packing material warehouse









Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

<u>Click here for A & AB members:</u>
http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw 3d 3d



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