SMETA

Sedex Members Ethical Trade Audit Report

Version 6.1

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC5000008749	Sedex Site Reference: *(only available on Sedex System)*	ZS1000009275
Business name (Company name):	Dongguan Lancai Garment Company Limited		
Site name:	Dongguan Lancai Garment Company Limited		
Site address:	Room 401, Building 3, No.12, XiLu Road, Humen town, Dongguan City, Guangdong 广东省东莞市虎门镇细卢路12号3栋401室 虎门镇 523916 CN	Country:	CN
Site contact and job title:	Ms. Guan Qiaoyun / Administration manager		
Site phone:	13826912862	Site e-mail:	2880606000@qq.com
SMETA Audit Pillars:	☑ Labour Standards	☑ Health and Safety (plus Environment 2-Pillar)	☑ Environment 4-pillar ☑ Business Ethics
Date of Audit:	2023-08-24		

Audit Company Name:
Benchmarks Company Limited

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

Audit Content:

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

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

2-Pillar SMETA Audit

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

4-Pillar SMETA

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

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

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

SMETA Declaration

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

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

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

Auditor Team			
Lead Auditor:	Joe Fang	APSCA Number:	21703717
Additional Auditors:	Kelson Zhang		21700122
Date of declaration:	2023-08-24		

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

Site Representation	
Full Name:	Ms. Guan Qiaoyun
Title:	Administration manager
Date of declaration:	2023-08-24
Comments: *Any exceptions to this must be recorded here (e.g. different sample size):* *Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).* *The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives*	
Nil	

Summary of Findings

Issue *(please click on the issue title to go direct to the appropriate audit results by clause)*	Area of Non–Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
0A - Universal rights covering UNGP			0	0	0	
0B - Management systems and code implementation			0	0	1	GE - ZAF600150182
1 - Freely chosen employment			0	0	0	
2 - Freedom of association and right to collective bargaining are respected			0	0	0	
3 - Working conditions are safe and hygienic	3.1 3.1	§1 §2	2	0	0	NC - ZAF600150178 NC - ZAF600150179
4 - Child labour shall not be used			0	0	0	
5 - Living wages are paid	5.1	§3	1	0	0	NC - ZAF600150180
6 - Working hours are not excessive	6.1	§4	1	0	0	NC - ZAF600150181
7 - No discrimination is practiced			0	0	0	
8 - Regular employment is provided			0	0	0	
8A - Subcontracting and homeworking			0	0	0	
9 - No harsh or inhumane treatment is allowed			0	0	0	
10A - Entitlement to work and immigration			0	0	0	
10B2 - Environment 2–pillar			0	0	0	
10B4 - Environment 4–pillar			0	0	0	
10C - Business ethics 4-pillar			0	0	0	

Local Law Issues

Issue	Description
§1	In accordance with Law of the PRC on Work Safety Article 28
§2	In accordance with standards for the Design of Industrial Enterprises (GBZ1-2010) 8.3.3
§3	The PRC Labor Law article 72
§4	The PRC Labour Law article 41

Site Details

Site Details			
Company Name	Dongguan Lancai Garment Company Limited		
Site Name	Dongguan Lancai Garment Company Limited		
GPS location (if available)	**GPS Address:**	No.12, XiLu Road, Humen town, Dongguan City, Guangdong, China	
	Coordinates:	E113°41'5", N22°49'57"	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license: 914419000766542110 and the period of validity was from 2013-08-14 to long-term.		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Production and sales for clothing (Knit tops, Woven tops and Dresses)/The main production process: Fabric cutting, Sewing, Trimming, Ironing, Inspection and Packing.		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The facility rented and located at 1st floor, 2nd floor and 4th floor room 401, Building 3, No.12, XiLu Road, Humen town, Dongguan City, Guangdong since 2013 year.		
Structure and number of buildings	**Building Name:**	Production building	
	Floor	**Description**	**Remark**
	1st floor	Fabric cutting and warehouse	895m²
	2nd floor	Other companies	They had no business with auditee.
	3rd floor	Sewing, Trimming, Ironing, Inspection and Packing	900m²
	4th floor	Office and other company	500m²
Visible structural integrity issues (large cracks) observed?	☐ Yes ☑ No Please give details: There was no visible structural integrity issue (e.g. large cracks) found during the audit.		
Does the site have a structural engineer evaluation?	☐ Yes ☑ No Please give details: The structure assessment for the buildings were provided during the audit.		
Site function	☐ Agent ☑ Finished Product Supplier ☐ Homeworker ☐ Pack house ☐ Service Provider	☑ Factory Processing/Manufacturer ☐ Grower ☐ Labour Provider ☐ Primary Producer ☐ Sub-contractor	

Months of peak season	Select a month to Select a month
Process overview	The main production process: Fabric cutting, Sewing, Trimming, Iorning, Inspection and Packing./ There were 2 cutting machines, 7 ironing machines, 33 sewing machines, and 2 riveting machines in the facility.
What form of worker representation is there on site?	☐ Union ☐ Worker Commitee ☑ Other ☐ None
Please give details:	Worker representative.
Is there any night production work at the site?	☐ Yes ☑ No
Are there any on site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Are there any off site provided worker accommodation buildings	☐ Yes ☑ No Please give details:
Were all site provided accommodation buildings included in this audit	☐ Yes ☑ No Please give details: N/A. The facility didn't provide accommodation for employees.

Audit Parameters			
Time in and time out	Day 1		
	In	09:10	
	Out	16:30	
Audit type:	FULL_INITIAL		
Was the audit announced?	ANNOUNCED		
Was the Sedex SAQ available for review?	Yes		
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No		
Who signed and agreed CAPR	Ms. Guan Qiaoyun / Administration manager		
Is further information available	No		

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

Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	3	0	0	28	0	0	0	31
Worker numbers – female	1	0	0	24	0	0	0	25
Total	4	0	0	52	0	0	0	56
Number of Workers interviewed – male	1	0	0	5	0	0	0	6
Number of Workers interviewed – female	1	0	0	3	0	0	0	4
Total – interviewed sample size	2	0	0	8	0	0	0	10

Nationalities Structure		
Nationality of Management	Chinese	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationaility 1: CHINESE approx %: 100%	
Was this list completed during peak season?	☐ Yes ☑ No Please give details: No peak season within 12 months.	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	100%
	Salaried:	0%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	N/A.

Worker Interview Summary	
Were workers aware of the audit?	☑ Yes ☐ No
Were workers aware of the code?	☑ Yes ☐ No
Number of group interviews:	1 group of 4 workers.
Number of individual interviews:	Male: 3 Female: 3
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	☑ Yes ☐ No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☑ Yes ☐ No
In general, what was the attitude of the workers towards their workplace?	☑ Favorable ☐ Non-favourable ☐ Indifferent
What was the most common worker complaint?	Nil
What did the workers like the most about working at this site?	The wages was paid on time, Comfortable working environment, Good communication with management.
Any additional comment(s) regarding interviews:	Nil
Attitude of workers to hours worked:	Favourable
Is there any worker survey information available?	☐ Yes ☑ No Please give details:

Attitude of workers:
10 workers were randomly selected from different departments for private interview. During the whole process, the interviewed workers were positive toward the management and the company. They had different kinds of EHS/SA trainings conducted in the factory. The drinking water and first aid kits were provided in workshops. They were satisfied with the working condition, timely payment provided by the factory, and factory treated them with respect. According to the workers interview, no any exceptions were found. No harsh or inhumane implementation and discrimination was reported.
Attitude of worker's committee/union reps:
The worker representative was interviewed during the audit. She stated that she was elected by employees. And the factory management held the meeting with them for collecting employees' comment regularly. During daily work, she collected the comment on the factory from employees. She provided the positive information on the factory to auditor during audit.
Attitude of managers:
The factory management was positive towards auditor, they provided relevant documents to auditor for review, showed auditor the production process during factory tour, and provided auditor an independent room for workers interview. At the closing meeting, auditor provided the factory representative a general overview, and explained all findings to them. Meantime, auditor made the corrective suggestions corresponding to findings to the factory representatives signed the CAPR.

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. The site published a human rights statement, and posted in notice board. 2. Ms. Guan/Administrative Manager was responsible for implementing standards concerning Human Rights. 3. There was formal training given to all employees and their suppliers on the need to protect human rights. 4. The terms and conditions for employees were stated in the employee handbook and all workers were trained in the grievance procedure.
Evidence examined:
1. Employee handbook was reviewed. It stipulated complying with ETI Code, written policies and procedure that being provided individually to employees. 2. Company manual contained 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. Management interview and worker interview.
Any other comments:
NilNil

Policy statement that expresses commitment to respect human rights?	☑ Yes ☐ No Please give details: There was a policy statement that expresses commitment to respect human rights.
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: Worker's manuals contained 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.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	☑ Yes ☐ No Please give details: Ms. Guan/Administrative Manager was responsible for implementing standards concerning Human Rights.

Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☑ Yes ☐ No Please give details: The factory had a transparent system in place for confidentially reporting, and dealing with human rights impact without fear of reprisals towards the reporter.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☑ Yes ☐ No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☑ Yes ☐ No Please give details: All employee information and personnel files were kept locked away in the human resources office and only viewed by manager.
Measuring Workplace Impact	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 3.0% This year 3.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	1.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%
Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	☑ Yes ☐ No Please give details: The facility provided the accidents records of 2022~2023 to review.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%

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

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
The factory had well set up a proper management system to implement social compliance requirements. Ms. Guan/Administrative Manager was assigned as senior management representative who's in charge of implementing and updating all social compliance policy and procedure.
Evidence examined:
1. Employee handbook was reviewed. It stipulated complying with ETI Code, written policies and procedure that being provided individually to employees. 2. Company manual contained 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. Management interview and worker interview.
Any other comments:
Nil

Management Systems	
In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☑ No Please give details: No fine for any non-compliance was noted from the related.
Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: Policies and procedures on "No force labour, no child labour, no discrimination and prohibition of harassment & abuse" were established.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	The factory had established policies and procedures which ensured the site met in particular with discrimination, child labour prohibition and general human rights standards.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☑ Yes ☐ No Please give details: The training records were provided to review.

If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☑ Yes ☐ No Please give details: According to the interview with workers, all of them had been well trained.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	☑ Yes ☐ No Please give details: The facility Obtained ISO9001:2015 certificate by CCAC on August 18, 2021. (Cer#51821Q06544ROS, Valid until: August 17, 2024)
Is there a Human Resources manager/department?	☑ Yes ☐ No Human Resources was responsible by Ms. Guan/Administrative Manager.
Is there a senior person /manager responsible for implementation of the code?	☑ Yes ☐ No Please give details: Implementation of the Code was responsible by Ms. Guan/Administrative Manager.
Is there a policy to ensure all worker information is confidential?	☑ Yes ☐ No Please give details: A displayed policy on the confidentiality of an individual's personal information.
Is there an effective procedure to ensure confidential information is kept confidential?	☑ Yes ☐ No Please give details: Notice on filing drawer's state can only be accessed by authorized personnel.
Are risk assessments conducted to evaluate policy and procedure effectiveness?	☑ Yes ☐ No Please give details: The last risk assessment was conducted on March 01, 2023.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: Any problems found at internal audit were brought to the attention of senior management and corrections made.
Does the facility have a policy/code which require labour standards of its own suppliers?	☑ Yes ☐ No Please give details: The site sent a copy of the ETI code and any relevant customer codes to its own suppliers.
Land Rights	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☑ Yes ☐ No Please give details: The copy of land rights licenses was provided for review.

Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☑ Yes ☐ No Please give details: The factory recognized and applied national laws and practices relating to land title.
Does the site have a written policy and procedures specific to land rights?	☐ Yes ☑ No Please give details: N/A.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	☐ Yes ☑ No Please give details: No such finding was found.
Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes ☑ No Please give details: N/A.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	☐ Yes ☑ No Please give details: No illegal appropriation of land for facility building or expansion of footprint.

Good Example	Evidence

[Back to findings summary]

Good Example	
Status	OPEN
Reference	ZAF600150182
Clause	0B - Management Systems and code Implementation
Issue Title	31 - Site supports community and charitable projects
Subcategory	Site's Awareness of Code/Legal Requirements
New or carried over?	☑ New ☐ Carried Over
Explanation to the good example	Through onsite observation and management interview, it was noted that the facility regularly provided material or financial donations for support the schools in impoverished areas.
Evidence	There were many honors and donation certificates regarding helping impoverished areas were found in the facility.

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IMG_20230824_122234.jpg

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

Current Systems and Evidence Examined
To complete ‘current systems’ Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
1.The site had policy which prohibited force labour and prison labour was available for review. 2.The hiring procedures stated that the ID cards should be presented upon hiring but only the copies of identification card will be kept in the personal files. The original one would be returned to workers. As per the interview, most of them get the hiring information from posters or internet. No deposit was collected by the factory. 3.The facility policy also stated that it was free for them resigned from the site with one month’s prior written applications. The statutory holidays, benefits, wages, working hours were also including in the facility regulations. 4.The procedures also stated that the employees were free to have water break and rest during the work. They can refuse to conduct overtime work by notification in advance. All above were also confirmed in management and interview.
Evidence examined:
1.Hiring procedures from Rules and Regulations of the facility. 2.HR employment system. 3.Employee manual. 4.Payrolls. 5.Personal data files (to check for if original documentation was held by facility). 6.Resignation documents of resigned employee. 7.Management and workers’ interview.
Any other comments:
Nil

Is there any evidence of retention of original documents, e.g. passports/ID’ (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)	☐ Yes ☑ No Please give details:
Are there any restrictions on workers’ freedom to terminate employment?	☐ Yes ☑ No Please give details: Through document review, sampled workers and management interview, no any restrictions on workers' freedom to terminate employment.

If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☑ Not Applicable Please give details: N/A.
Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☑ No Please give details: Through document review, sampled workers and management interview, no any restrictions on workers' freedom to leave the site at the end of the work day.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☑ Yes ☐ No ☐ Not Applicable Please give details: The site understood the risks of forced / trafficked / bonded labour in it's supply chain, and no forced labor was used.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☑ Yes ☐ No Please give details: The factory had procedures on prohibiting forced labour. The procedures were well implemented to make sure no forced labours were used.

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The facility had established the policy on freedom of association and right to collective bargaining. 2.The employees were trained on this policy. Employees had right to join or form any legal organization. 3.There was a worker representative committee in the facility. Worker representatives were selected by the employees themselves. Worker representatives' meetings were conducted. 4.Employees also reported that they were freely and welcomed to express their concerns to worker representatives, supervisor or suggestion box, and would not be punished. As per the provided record from suggestion record, there was no concern till the current assessment.
Evidence examined:
1.Written freedom of association procedure. 2.Polices of worker representative committee and union. 3.Enrolment Requirements. 4.Meeting records of worker representatives with workers and with management. 5.The record from the suggestion box and what relevant actions have been taken was reviewed. 6.Employee's manual.
Any other comments:
Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	☐ Union ☑ Other	☐ Worker Commitee ☐ None
Other details:	Work representative	
Is it a legal requirement to have a union?	☐ Yes ☑ No	
Is it a legal requirement to have a worker's committee?	☐ Yes ☑ No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	☑ Yes ☐ No Please give details: Workers could raise their concerns through worker representatives, telephone, suggestion box, directly communicating with the factory management.	
Is there evidence of free elections?	☑ Yes ☐ No	

Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☑ Yes ☐ No Please give details: The meeting room was provided for worker representatives to conduct meeting with management.
Name of union and union representative, if applicable:	N/A.
Is there evidence of free elections?	☐ Yes ☐ No ☑ Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	There were 2 worker representatives (1 male and 1 female) in the faciltiy.
Is there evidence of free elections?	☑ Yes ☐ No ☐ Not Applicable
Are all workers aware of who their representatives are?	☑ Yes ☐ No Please give details: Through sampled workers interview, they knew the their representatives well.
Were worker representatives freely elected?	☑ Yes ☐ No
Date of last election:	2023-03-02
Do workers know what topics can be raised with their representatives?	☑ Yes ☐ No
Were worker representatives/union representatives interviewed?	☑ Yes ☐ No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	The meeting was conducted once every three months in their procedure. The last meeting was held in July 20, 2023.
Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☑ No

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

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
1.Overall, the facility did appear to have a system in place to ensure a safe and hygienic working environment. 2.Sufficient firefighting equipment was available in the work floor. The firefighting equipment was inspected by the facility regularly. 3.Workers had regular safety trainings for their workstations, as well as for fire safety. 4.First aid kit was provided for every work floor. Sufficient supply was available for each first aid kit box. 5.Toilets appeared clean and employees were free to use it. 6.Potable water was provided to all employees free of charge. 7.There was one health and safety committee in the facility.
Evidence examined:
1.Employee handbook. 2.Employee safety training records. 3.Fire evacuation and fire-fighting drill records. 4.Equipment maintenance records. 5.Special equipment maintenance records. 6.First-aid training records.
Any other comments:
Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☑ Yes ☐ No Please give details: The factory had established procedures and policies on health and safety. The procedure and polices were fit for the factory's operations and had been communicated to workers by trainings upon joining the factory.
Are the policies included in workers' manuals?	☑ Yes ☐ No Please give details: The factory had established procedures and policies on health and safety. The procedure and polices were fit for the factory's operations and had been communicated to workers by trainings upon joining the factory.

Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☑ No Please give details: N/A. There was no any structural addition in the facility.
Are visitors to the site informed on H&S and provided with personal protective equipment?	☑ Yes ☐ No Please give details: The visitor was informed to use PPE at the facility.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	☐ Yes ☑ No Please give details: There was no legal requirement for medical room in China.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☑ Yes ☐ No Please give details: There were certificated 2 first aiders in the facility.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☑ No Please give details: The facility did not provide worker transport.
Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☑ No Please give details: N/A. The facility did not provide accommodation for all employees.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☑ Yes ☐ No Please give details: The H&S Risk Assessment was conducted on March 01, 2023.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☑ Yes ☐ No Please give details: The factory had environmental impact assessment (EIA) for construction project.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☑ Yes ☐ No Please give details: There was no banned chemical used at the facility.

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance			
Status	OPEN		
Reference	ZAF600150178		
Clause	3 - Working Conditions are Safe and Hygienic		
Issue Title	281 - Lack of adequate/appropriate signage in high risk areas on usage of PPE (e.g. importance of ear plugs for high noise or specific PPE for chemical use/handling)		
Subcategory	Personal Protective Equipment/Clothing		
New or carried over?	☑ New	☐ Carried Over	
Root cause	☐ Training ☐ Costs ☑ Other	☐ System ☐ Lack of workers	
Root cause - Other	Lack of knowledge of the law.		
Local law issue	In accordance with Law of the PRC on Work Safety Article 28		
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.		
Explanation to the non compliance	No PPE sign was posted at the position with hazardous. As observed, there was no signage of the stainless steel mesh safety gloves for the electrical scissors. 审核中发现工厂未有在存在风险岗位附近张贴相关劳保用品标识。 例如，在裁剪车间发现，该车间未有张贴钢丝手套标识以提醒使用电剪的工人佩戴相关劳保用品。		
Follow up method	☐ Follow up audit	☑ Desktop audit	
Timescale	☐ Immediate ☐ 90 days ☐ 365 days	☑ 30 days ☐ 120 days ☐ Other	☐ 60 days ☐ 180 days
Actions	It is recommended that the facility should post clear warning signs for high-risk machines and equipment. 建议企业在有较大危险因素的设备上张贴安全警示标志。		

NC- Lack of adequate signage in high risk areas on usage of PPE.jpg

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	ZAF600150179
Clause	3 - Working Conditions are Safe and Hygienic
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate
Subcategory	First Aid / Accidents
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☐ System ☐ Costs ☐ Lack of workers ☑ Other
Root cause - Other	Lack of monitoring
Local law issue	In accordance with standards for the Design of Industrial Enterprises (GBZ1-2010) 8.3.3
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
Explanation to the non compliance	Medicines in first-aid kits expired. During facility tour, it was noted that the hydrogen dioxide solution in the first-aid kits at fabric cutting workshop expired on May 01, 2022. 急救箱内药品过期。 在现场巡查时，审核员发现布料裁切车间一个急救药箱中的过氧化氢溶液有效期截止2022年05月1日，已经过期。
Follow up method	☐ Follow up audit ☑ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other
Actions	It is recommended that the facility should check the medicines of the first-aid kits regularly and ensure the medicines in validity. 建议企业应定期对急救箱中的药品进行检查，确保药品处于有效期内。

NC - Medicines in first-aid kits expired.jpg

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The complete hiring procedure was established in the facility, which required that the minors under 16 years old were not allowed to join the facility. 2.The facility would verify all employees' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. The system was effectively implemented. 3.The child labour remediation policy was established in the facility. 4.There was not student or apprentice at the facility.
Evidence examined:
1.Policy about prohibition of child labour, remediation of child labour, special protection of young worker. 2.Employees' personal files with copies of identification cards, all employees' registration check list and labour contracts for sample employees. 3.Employees and management's interview.
Any other comments:
Nil

Legal age of employment:	16
Age of youngest worker found:	22
Are there children present on the work floor but not working at the time of audit?	☐ Yes ☑ No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	☐ Yes ☑ No Please give details: There was no workers at facility under 18 years.

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

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
1.The local minimum wage was RMB1,900 (e.q RMB10.92/hour) per month since December 01, 2021 and RMB1,720 per month since July 01, 2018. 2. Minimum wage was guaranteed for employees. 3.The original social insurance receipts were provided for review. Insufficient social insurance was detected. 4.The employees were paid by hourly wage and bonus in the facility. 5.The wage was paid for the employees before 30th of each month for the previous recycle. 6.Pay slips were provided when wages are issued. 7.Payroll records from August 2022, February 2023 and June 2023 were provided by the factory for checks. 8.No Illegal disciplinary deduction was detected in the facility.
Evidence examined:
1. Wages and benefits policy and procedure. 2. Local and national laws. 3. Local legal min wage documents. 4. Overtime premiums records. 5. Labour contracts for all workers. 6. Resignation records. 7. Production records. 8. Social security insurance payment receipts. 9. Worker interview and management interview.
Any other comments:
Nil

Summary Information			
Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 184.0	NO
Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 18.5 Per Month: 77.0	NO

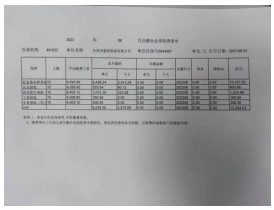
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: 87.4 Per Week: 436.8 Per Month: 1900.0	Actual Per Day: 87.4 Per Week: 436.8 Per Month: 1900.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 8.19 Per Week: 267.6 Per Month: 2102.2	NO
Wages Analysis:			
Were accurate records shown at the first request?	☑ Yes ☐ No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Attendance records and payrolls of 10 sampled employees August, 2022, February 2023 and June 2023 were reviewed in this audit.		
Are there different legal minimum wage grades? If Yes, please specify all.	☐ Yes ☑ No		
If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☑ Not Applicable Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☑ Meet ☐ Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	The lowest actual wage was RMB1,900 (e.q RMB10.92/hour) per month since December 01, 2021, which met the legal minimum requirement.		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found:Bonus Scheme found:Post Allowance and full Attendance Award. Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	The dedecutions including Social insurance and personal income tax were required by law.		
Have these deductions been made?	☑ Yes ☐ No		
Please list all deductions that have been made.	1. Personal income tax. 2. Social insurance.		
Please list all deductions that have not been made.	Nil		
Were appropriate records available to verify hours of work and wages?	☑ Yes ☐ No		
Were any inconsistencies found? (if yes describe nature)	☐ Yes ☑ No		

Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☑ Yes ☐ No Please give details: All working hours in time records were paid rightly.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	☐ Yes ☑ No Please give details:
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation ☐ Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☑ Yes ☐ No Please give details: There was an annual review when local minimum wage rates were increased.
Are workers paid in a timely manner in line with local law?	☑ Yes ☐ No
Is there evidence that equal rates are being paid for equal work:	☑ Yes ☐ No Please give details: Through factory rules review, payroll records review and employee interview, it was confirmed that equal rates were being paid for equal work.
How are workers paid:	☑ Cash ☐ Cheque ☐ Bank Transfer ☐ Other

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	ZAF600150180
Clause	5 - Living Wages are Paid
Issue Title	423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic
Subcategory	Benefits & Insurance
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☐ System ☐ Costs ☐ Lack of workers ☑ Other
Root cause - Other	Partial employees were unwilling to purchase the social insurance.
Local law issue	The PRC Labor Law article 72
ETI code	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.
Explanation to the non compliance	Insufficient social insurance participated. Through document review, it was noted that not all employees had participated in all 5 types of social insurance. There were 74 employees with 8 retirees and 8 new employees during audit, 58 eligible employees need to participated in 5 types of social insurance. However, only 10 out of 58 eligible employees (17.2%) had participated in basic retirement insurance, unemployment insurance, disability caused by work-related injury insurance, medical insurance and maternity insurance. (Noted: The facility provided the commercial injury insurances for 10 employees as backup. Insurance company: China Ping An Property Insurance Co., Ltd; Insurance policy number # 1052800390201954158 3; Insurance validity period: May 5th, 2023 to May 4th, 2024; Number of insured persons: 10; Insurance compensation amount: 100W) 参加的社会保险不足。 通过文件审查，注意到并非所有员工都参加了所有5种类型的社会保险。审计期间有74名员工，其中8名退休人员和8名新员工，58名符合条件的员工需要参加5种类型的社会保险。然而，58名符合条件的雇员中只有10人（17.2%）参加了基本退休保险、失业保险、工伤致残保险、医疗保险和生育保险。（注：企业为10名员工提供了商业伤害保险作为备用。保险公司：中国平安财产保险股份有限公司；保险单号：1052800902019541583；保险有效期：2023年5月5日至2024年5月4日；参保人数：10人；保险赔偿金额：100W）
Follow up	☑ Follow up audit ☐ Desktop audit



NC- Insufficient social insurance participated..jpg

method			
Timescale	☐ Immediate	☐ 30 days	☑ 60 days
	☐ 90 days	☐ 120 days	☐ 180 days
	☐ 365 days	☐ Other	
Actions	It is recommended that the facility shall ensure all employees participate in the all 5 types of social insurance schemes and therefore receive all of their statutory welfare to comply with the Law. 建议企业应保证所有员工均参加全部五种社会保险。		

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.All workers stated that the overtime was conducted on a voluntary basis. 2.Electrical attendance machine was used to record working hour. 3.Time records from July 01, 2022 to the audit day were provided for review. The time records of August 2022, February 2023, and June 2023 were selected for sample review. 4.There was one day off a week was guaranteed in the sample months. 5. The normal working hour was from 8:00 to 17:30 with 1.5 hours for lunch break from 12:00 to 13:30. Overtime started from 17:30 to 18:00 and 18:30 to 20:00 if necessary.
Evidence examined:
1.Management and Employee interview. 2.Time records. 3.Production records. 4.Leave records.
Any other comments:
Nil

Working hours' analysis	
Systems & Processes	
What timekeeping systems are used?	Electrical attendance machine
Is sample size same as in wages section?	☑ Yes ☐ No Please give details:
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	☑ Yes ☐ No
Are there any other types of contracts/employment agreements used?	☐ Yes ☑ No

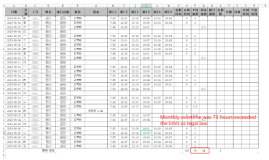
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	☐ Yes ☑ No
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	☑ 1 in 7 days ☐ 2 in 14 days ☐ No (please explain)
Is this allowed by local law?	☑ Yes ☐ No
Maximum number of days worked without a day off (in sample):	6
Standard/Contracted Hours worked	
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	☐ Yes ☑ No % of workers: null% Frequency:
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	☐ Yes ☑ No
Overtime Hours worked	
Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 77 hours/month, 18.5 hours/week, 2 hours/workday in August 2022. 72.5 hours/month, 18.5 hours/week, 2 hours/workday in February 2023. 73 hours / month, 18.5 hours / week, 2 hours/workday in June 2023.
Combined hours (standard or contracted + overtime hours = total) over 60 found?	☐ Yes ☑ No Please give details: Highest combined hours: standard (40) + overtime hours (18.5) = 58.5 hours
Approximate percentage of total workers on highest overtime hours:	90.0%
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	☑ Yes ☐ No ☐ Conflicting Information Please give details: Through worker interview, the overtime was voluntary.
Overtime premium	
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	☑ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium Please give details: 150% of regular wage for regular overtime hours and by 200% of regular wage for rest overtime hours, and 300% of regular wage for statutory overtime.
Is overtime paid at a premium?	☑ Yes ☐ No 100% employees were paid monthly.

If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No ☐ Consolidated pay ☐ Collective Bargaining agreements ☑ Other
Please give details	150% of regular wage for regular overtime hours and by 200% of regular wage for rest overtime hours, and 300% of regular wage for statutory overtime.
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	☐ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week is voluntary ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☑ Other reasons (please specify)
Please give details	N/A. The maximum work time per week less 60 hours.
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A. The maximum work time per week less 60 hours.
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☑ No
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	☐ Yes ☑ No

Non-Compliance	Evidence

[Back to findings summary]

Non-Compliance	
Status	OPEN
Reference	ZAF600150181
Clause	6 - Working Hours are not Excessive
Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive
Subcategory	Overtime
New or carried over?	☑ New ☐ Carried Over
Root cause	☐ Training ☐ System ☐ Costs ☐ Lack of workers ☑ Other
Root cause - Other	Unstable production order
Local law issue	The PRC Labour Law article 41
ETI code	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.
Explanation to the non compliance	Monthly overtime hours exceeded the legal requirement (maximum 36 overtime hours per month). During document review, it was noted that sampled employees worked in excess of the statutory overtime hour limits. A review of attendance records for August 2022, February 2023 and June 2023 yielded the following: (1)10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 77 hours) in August 2022. (2) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 72.5 hours) in February 2023. (3) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 73 hours) in June 2023. 月加班时间超过法规要求（最高每月 36 小 时）。 审核发现，抽样的员工加班时间超过了法定 标准 ，抽样 2022 年 08 月、2023 年 02 月和 2023 年 06 月的 考勤发现： （1）10/10 名抽样员工的 2022 年 08月加 班 时间超过了每月法定的 36 小时标准 ，最 高为 77 小时。 （2）10/10 名抽样员工的 2023 年 02月加 班时间超过了 每月法定的 36 小时标准，最 高为 72.5 小时。 （3）10/10 名抽样员工的 2023 年 06月加 班时间超过了 每月法定的 36 小时标准，最 高为 73小时 。
Follow up method	☑ Follow up audit ☐ Desktop audit
Timescale	☐ Immediate ☐ 30 days ☑ 60 days ☐ 90 days ☐ 120 days ☐ 180 days



NC-Monthly overtime exceeded the limit as legal law.bmp

	☐ 365 days ☐ Other
Actions	It is recommended that the facility should ensure the overtime of workers be in accordance with the legal requirements. 建议企业应确保工 作时间符合国家法律。

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.There were no apparent concerns with regard to discrimination in any form at the facility. 2.Employees reported that they were treated equally. No discrimination based on gender, religions, regions or marriage status was reported. No employees were required to conduct physical examination on pregnancy or HBV.
Evidence examined:
1.Facility regulation. 2.Labour contracts. 3.Payrolls (to check for equal remuneration for like work)
Any other comments:
Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 55.6%		Female: 44.4%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	There were 6 women who are in skilled roles.		
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	☐ Hiring ☐ Promotion	☐ Compensation ☐ Termination or retirement	☐ Access to training ☑ No evidence of discrimination found
Please give details	N/A.		
Professional Development			
What type of training and development are available for workers?	Workers were provided with regular health and safety training; Different positions were provided with different training related to their workings. All workers could join training equally. Production workers could be promoting to line supervisor if working extremely well. Line managers also could be promoting to higher position. Promoting paths were regulated in employee manual.		
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	☑ Yes ☐ No		

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The factory had established procedures on employment. Administration department was responsible for employment. Only permanent workers were used by the factory. 2.Workers were hired mainly by recruitment advertisement in front of the factory gate or introduced by other workers. All employees were hired by the factory directly. 3.Labour contracts were signed within one month after joining the factory. Copies of labour contracts were provided workers.
Evidence examined:
1.Employee handbook. 2.Labour contracts. 3.Payrolls Age documents.
Any other comments:
Nil

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

Please give details about recruitment agencies for migrant workers:	Number of (in country) recruitment agencies used: 0 Number of (outside of local country) recruitment agencies used: 0
Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☑ No Please give details: N/A. No any deductions for all workers included migrant workers
Is there any observation on this finding?	No any deduction.
Are any migrant workers in skilled, technical or management roles? (This should include all migrant workers including permanent workers, temporary and/or seasonal workers)	☑ Yes ☐ No There were 10 migrant workers in skilled role.
Non-employee workers	
Recruitment Fees	
Are there any fees?	☐ Yes ☑ No
Agency Workers (if applicable) (Workers sourced from a local agent who are not directly paid by the site, but paid by the agency. Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)	
Number of agencies used (average):	0
Please provide the names of agencies if applicable	N/A. No agency was used.
Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☑ No
Were sufficient documents for agency workers available for review?	☐ Yes ☑ No
Is there a legal contract agreement with all agencies?	☐ Yes ☑ No Please give details: No any legal contract agreement with agencies.
Does the site have a system for checking labour standards of agencies?	☐ Yes ☑ No Please give details: N/A. No agency was used.
Contractors (Contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include, gang bosses, labor provider.)	
Any contractors on site?	☐ Yes ☑ No Please give details: Through onsite observation and document review, no any contractor was used.
Do all contractor workers understand their terms of employment?	☐ Yes ☑ No Please give details: N/A. no any contractor was used.

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

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.
Current Systems:
1.There was no subcontractor used at the facility. 2.No home worker was identified by auditors currently.
Evidence examined:
1.Onsite observation. 2.Management interview.
Any other comments:
Nil

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

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.As informed by interviewed employees, most employees spoke highly of management. 2.As informed by interview employees and discipline and reward records review, no employee was punished for any reason. 3.There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any harsh or inhumane Treatment cases.
Evidence examined:
1. Discipline and reward policy and social accountability manual. 2. Discipline and reward procedure, records and employee handbook. 3. Training records. 4. Interview with management and workers.
Any other comments:
Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☑ Yes ☐ No Please give details: The worker can report such issues to the local department.
If yes, are workers aware of these channels and have access? Please give details.	The worker can report such issues to the local department.
If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism,comment box etc. Please give details.	Workers were aware of the channel and they could report violations to the local labour force bureau freely.
Which of the following groups is there a grievance mechanism in place for?	☑ Worker ☐ Communities ☐ Suppliers ☐ Other
Please provide grievance mechanism details	Employees could raise their grievances directly to supervisors, worker representatives and send emails to state their opinions and suggestions, and then the management would post corresponding feedback on the bulletin board.
Are there any open disputes?	☐ Yes ☑ No Please give details:
Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☑ Yes ☐ No Please give details:

Is there a published and transparent disciplinary procedure?	☑ Yes ☐ No Please give details:
If yes, are workers aware of these the disciplinary procedure?	☑ Yes ☐ No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☑ No Please give details:

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1. As per document review, management and workers interview, no employment agency was used by the factory. 2. The factory recruited the new workers directly by the advertisements. 3. All workers in the factory were Chinese; and mainly from other provinces of China. 4. All workers had the proper legal rights to work in this region. 5. No agency staff or foreign worker was found during this audit.
Evidence examined:
1. Hiring procedure. 2. Worker handbook. 3. Personal files and contracts. 4. Interview with management and workers.
Any other comments:
Nil

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The facility had established written environment policy. One senior manager was responsible for continuous improvements in their environmental performance. 2.The facility conducted some training for all employees on the avoidance of environment impact. 3.The facility had obtained the environment impact assessment report, completion acceptance report for their environmental construction project. Environmental impact approval. 4.Based on workers interview, they were trained on environmental protection.
Evidence examined:
1.Legally required environmental documents were provided for review. 2.Environmental policy. 3.Energy bills. 4.Water bill. 5.Worker and management interview. 6.Site tour.
Any other comments:
Nil

Environmental Analysis	
Is there a manager responsible for Environmental issues (Name and Position):	Ms. Guan/Administration Manager was responsible for environmental issues.

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☑ Yes ☐ No Please give details: The site has conducted a risk assessment on the environmental impact of the site including implementation of controls to reduce identified risks.
Does the site have a recognised environmental system certification such as ISO 14000 or equivalent?	☐ Yes ☑ No Please give details: The facility did not obtain ISO 14001 certificate.
Does the site have an Environmental policy?	☑ Yes ☐ No
If yes, is it publicly available?	☑ Yes ☐ No
If yes, does it address the key impacts from their operations and their commitment to improvement?	☑ Yes ☐ No Please give details: The key impacts were addressed in the environment policy and would be reviewed and updated.
Does the site have a Biodiversity policy?	☑ Yes ☐ No
Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.?	☐ Yes ☑ No Please give details: No any other sustainability system present.
Have all legally required permits been shown?	☑ Yes ☐ No Please give details: All the legally required documents were available and valid during this audit.
Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☑ Yes ☐ No ☐ Not Applicable Please give details: There was a documentation process to record hazardous chemicals used in the manufacturing process in the factory.
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☐ Yes ☑ No Please give details: There was no system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.
Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☑ Yes ☐ No Please give details: Reduction targets were established to reduce costs
Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☑ Yes ☐ No Please give details: Weights of recycled wastes were recorded for continuous improvement targets.

Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	☑ Yes ☐ No Please give details: The facility measured to reduce costs and monitored the consumption of key utilities of water, energy and natural resources.
Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☐ Yes ☑ No Please give details: No sub-contracting agency was used.

Usage/Discharge analysis		
Criteria	Previous year: 2022	Current year: 2023
Electricity Usage: Kw/hrs	360000	240000
Renewable Energy Usage: Kw/hrs	0	0
Gas Energy Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	No	No
If Yes, please state result		
Water Sources	local water authority	local water authority
Water Volume Used	2500	1680
Water Discharged	Connecting to urban sewage pipes	Connecting to urban sewage pipes
Water Volume Discharged	600	300
Water Volume Recycled	300	300
Total waste produced	15 ton	8 ton
Total hazardous waste produced	0	0
Waste to recycling	5 ton	4 ton
Waste to landfill	0	0
Waste to other	10 ton	4 ton
Total Product Produced	1200000 pcs	80000 pcs

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

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current Systems:
1.The company manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery. 2.The company established a business ethics policy which was communicated to workers through posters and training. 3.The site had received and read the Business Ethics policy of the auditor/audit company.
Evidence examined:
1.Bribery. 2.Corruption. 3.Training records, interview with management and workers. 4.Worker handbook.
Any other comments:
Nil

Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☑ Internal Policy ☑ Policy for third parties including suppliers Please give details: There was a written policy on the need to avoid bribes and fraudulent practices.

Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☑ Yes ☐ No Please give details: All relevant personnel had been given training of the policy.
Is the policy updated on a regular (as needed) basis?	☑ Yes ☐ No Please give details: The facility reviewed its business ethics policy regularly.
Does the site require third parties including suppliers to complete their own business ethics training	☐ Yes ☑ No Please give details: No discussion on this topic with 3rd parties.

Attachments

ZAA600021514_BMSZ012201-01B_Dongguan Lancai Garment Co.,Ltd_Initial_Aug 24, 2023_Signed Onsite CAP(4P).pdf	ZAA600021514_BMSZ012201-01B_Dongguan Lancai Garment Co.,Ltd_Initial_Aug 24, 2023_Photo Form.pdf

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