
Auditee :	Dongguan Leto Sports Apparel Co., Ltd
Audit Date From :	30/11/2020
Audit Date To :	30/11/2020
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	BureauVeritas
Auditor's Name(s) :	Inphy Wang(Lead)
Auditing Branch (if applicable) :	



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Rating Definitions



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

Main Auditee Information



Name of producer :	Dongguan Leto Sports Apparel Co., Ltd		
DBID number :	396137		
Audit ID :	199352		
Address :	3F, No.33 East Seven Road, Longyan Industrial Zone, Humen Town Dongguan		
Province :	Guangdong	Country :	China
Management Representative :	Ms. Peng Riling/Finance Supervisor		
Contact person:	Riling Peng	Sector :	Non-Food
Industry Type :	Textiles, clothing, leather	Product group :	Apparel
Product Type :	sportswear		

Audit Details



Audit Range :	<input type="checkbox"/> Full Audit	<input checked="" type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 30/11/2021	

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

Executive summary of audit report
<p>The auditee (the name in Chinese was '东莞市雷腾服饰有限公司', Business License No. was 91441900055367870G) was established on October 15, 2012, and located at 3F, No.33 East Seven Road, Longyan Industrial Zone, Humen Town, Dongguan City. (the address in Chinese was '东莞市虎门镇龙眼工业区东七路33号3楼'). The auditee specialized in the manufacture of sportswear. The main produce processes included cutting, sewing, printing, ironing and packing. According to the factory management, peak season was not obvious.</p> <p>The auditee rented 3F and 4F of one 5-storey building used for office, workshop and warehouse. No dormitory, kitchen and canteen in the factory. The total architecture occupied areas of the factory was 2495.8 square meters.</p> <p>There were a total of 49 employees (31 productive employees and 18 non-productive employees) with 26 male and 23 female. The youngest employee noted during this audit was above 19 years old.</p> <p>The factory adopted electronic attendance system to record working hours of employees. Per management and document review, all production employees conducted 1 shift: 8:00-12:00 and 13:30-17:30. Wages of employee were paid before the 16th day of the next month by cash with wage stubs issued to employees and the employees' signatures on the payrolls. Per payroll review and interviews with management and employees, all productive employees were paid by hourly rate.</p> <p>During the audit, employees' time records wage record were sampled as follows for working hour and wage testing: 15 sample population employees' time records (5 samples selected from October 2020 as current paid month, 5 samples selected from June 2020, 5 samples selected from January 2020). According to the sampled time records, it was noted that the maximum overtime hours were 2 hours per day, and 64 hours per month. The maximum weekly working hours were 58 hours per week. Employees worked consecutive 6 days at most.</p> <p>According to the sampled payroll records, it was noted that all employees were paid at least CNY 9.89 per hour, which was meet the local minimum wage CNY1720 per month or CNY 9.89 per hour since July 2018. All employees overtime hours worked on weekdays, weekends and public holiday were paid with 150%, 200% and 300% employee's normal wage, which was compliance with legal requirement.</p> <p>According to the social insurance payment receipt provided by auditee management, it was noted that 16 out of 49 (33%) employees were provided with pension and medical insurance and 15 out of 49 (31%) employees were provided with accident, unemployment and maternity insurance in November 2020. Auditee did not provide other commercial accident insurance for employees.</p> <p>Further, 5 employees were selected for private interviews from different workshops. No negative comment was issued during employee interviews. Interviewed employees were satisfied with the working environment, compensation, working hour and management team in the factory.</p> <p>A closing meeting was held with the factory representatives and all of the findings were discussed. Ms. Peng Riling/Finance Supervisor, Ms. Yan Shimei/HR Supervisor, Ms. Hong Jinfen/Worker representative attended the open meeting and the closing meeting. Ms. Peng Riling/Finance Supervisor signed the onsite CAP and agreed to take corrective actions.</p> <p>Remarks: 1. There was no contracted or agency worker used, no collective bargaining agreement was signed and no government waiver was obtained, either. Thus, no photo attached for the relevant documents. 2. The audited factory rented 3F and 4F of one 5-storey building. Rented contracts and business license are available for review. No worker exchange was noted. Thus only auditee occupied areas were included in audit scope. 3. Audit Company: Bureau Veritas Consumer Products Service Audit Company APSCA Number: 11600002 Lead Auditor Name: Inphy Wang APSCA Auditor Registered Number: RA 21701775</p>

Ratings Summary



Auditee's background information			
Auditee's name :	Dongguan Leto Sports Apparel Co., Ltd	Legal status :	Limited company
Local Name :	东莞市雷腾服饰有限公司 (91441900055367870G)	Year in which the auditee was founded :	2012
Address :	3F, No.33 East Seven Road, Longyan Industrial Zone, Humen Town	Contact person (please select) :	Riling Peng
Province :	Guangdong	Contact's Email :	cheney@letosports.com
City :	Dongguan	Auditee's official language(s) for written communications :	Chinese
Region :	North East Asia	Other relevant languages for the auditee :	Nil
Country :	China	Website of auditee (if applicable) :	Nil
GPS coordinates :	N22°50'20" E113°41'51"	Total turnover (in Euros) :	2000000.00
Sector :	Non-Food	Of which exports % :	100.00
Industry :	Textiles, clothing, leather	Of which domestic market % :	0.00
If other, please specify :		Production volume :	800000 pcs per year
Product Group :	Apparel	Production cost calculation :	Yes
If other, please specify :		Lost time injury calculation cost :	No
Product Type :	sportswear		

Auditee's employment structure at the time of the audit			
Total number of workers :	49	Total number of workers in the production unit to be monitored (if applicable) :	0
	MALE WORKERS	FEMALE WORKERS	
Permanent workers	26	23	
Temporary workers	0	0	
In management positions	5	9	
Apprentices	0	0	
On probation	0	0	
With disabilities	0	0	
Migrants (national citizens)	11	10	
Migrants (foreign citizens)	0	0	
Workers on the permanent payroll	26	23	
Production based workers	0	0	
With shifts at night	4	0	
Unionised	0	0	
Pregnant	-	0	
On maternity leave	-	0	

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: C

Deadline date:30/11/2021

GOOD PRACTICES:

Nil

AREAS OF IMPROVEMENT:

Per document review, management interview and employees' private interview, it was noted that the main auditee had established social compliance management policies, procedures, manuals and organization structure to implement BSCI code of conduct. However, gaps had been identified in implementation:

通过文件查阅、管理层访谈和员工访谈，审核发现工厂建立了社会责任管理方针，程序，手册及组织架构来执行BSCI行为规范。被审核方在系统执行方面和BSCI要求尚存在如下差距：

- 1.4 -** Previous Finding: The auditee did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit. Employees could refuse to work for overtime freely, without penalty. Employees were compensated with overtime wage in accordance with legal requirement. Factory management represented that they would take corrective action as soon as possible. Please refer to BSCI PA1.4. Not Closed: The auditee did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit. Employees could refuse to work for overtime freely, without penalty. Employees were compensated with overtime wage in accordance with legal requirement. Factory management represented that they would take corrective action as soon as possible. Please refer to BSCI PA1.4.

前次问题点：被审核方没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期，以至于员工加班超出法律规定。员工可以自由地拒绝加班工作，没有被处罚。工厂按照法规要求支付了加班费。工厂表示会尽快做出整改。请参看BSCI PA1.4 未改善：被审核方没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期，以至于员工加班超出法律规定。员工可以自由地拒绝加班工作，没有被处罚。工厂按照法规要求支付了加班费。工厂表示会尽快做出整改。请参看BSCI PA1.4

Remarks from Auditee:

None

Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: C

Deadline date:03/12/2020

Good practices

Nil

Areas of improvement

The overall observation shows the auditee partially fulfils the requirement of performance area. Per document review, management interview and employees' private interview, it was noted that the main auditee had established social compliance management policies, procedures, manuals and organization structure to implement BSCI code of conduct. However, gaps had been identified in some implementation.

整体观察表明，被审核方部分满足该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈，审核发现工厂建立了社会责任管理方针，程序，手册及组织架构来执行BSCI行为规范。被审核方在系统执行方面和BSCI要求尚存在一些差距。

- 1.4 -** The auditee did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit. Please refer to BSCI PA1.4. Employees could refuse to work for overtime freely, without penalty. Employees were compensated with overtime wage in accordance with legal requirement. Factory management represented that they would take corrective action as soon as possible.

被审核方没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期，以至于员工加班超出法律规定。请参看BSCI PA1.4 员工可以自由地拒绝加班工作，没有被处罚。工厂按照法规要求支付了加班费。工厂表示会尽快做出整改。

Remarks from Auditee

Performance Area 2 : Workers Involvement and Protection	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:30/03/2021
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: <p>There was a worker representative committee in the auditee and satisfactory evidence showed that workers elected their representatives freely, and worker representatives met the management every month. According to interview statement with worker representative and workers, they were familiar with workplace-related issues, their labor right e.g. the law, work contracts, job description, working rules. And workers had morning meeting for getting the information of workplace-related issues, the auditee also provided on-board training on workers' right to workers. It has been noted that the auditee had established grievance mechanism: the mechanism consisted of using suggestion boxes, worker representation and an open door policy on coming up with suggestion directly to workers' supervisor. However, gaps had been identified in implementation: 被审核方成立了员工代表委员会, 并且员工自由选出他们的代表, 员工代表每月会定期和管理层见面。根据员工代表及员工的访谈信息, 员工代表以及员工都很清楚被审核方场所相关信息, 以及员工的劳工权利, 例如劳动法, 劳动合同, 工作描述以及厂纪厂规等。同时, 被审核方每天会有早会的方式和员工沟通工厂场所的信息。审核过程发现, 被审核方已建立了申诉政策, 员工可通过意见箱, 员工代表或直接和主管进行沟通等方式提供投诉。所有这些过程均可通过文件以及访谈来核实。被审核方在系统执行方面和BSCI要求尚存在如下差距:</p> <p>2.2 - Previous Finding: Per document review and management interview, it was noted that the auditee defined long term goals to protect workers according to the BSCI COC. But the auditee did not trace the goals regularly. Defined and traced long term goals to protect worker was an important part in BSCI COC, which would be help the auditee to improve working condition, working hours, wage and benefit and so on to employees. Per factory tour, management interview and employees' interview, it was noted that the working condition was in good condition during this audit. The auditee management represented that they would analyze the actual situation and would take corrective action as soon as possible. Please refer to BSCI PA 2.2. Not Closed: Per document review and management interview, it was noted that the auditee defined long term goals to protect workers according to the BSCI COC. But the auditee did not trace the goals regularly. Defined and traced long term goals to protect worker was an important part in BSCI COC, which would be help the auditee to improve working condition, working hours, wage and benefit and so on to employees. Per factory tour, management interview and employees' interview, it was noted that the working condition was in good condition during this audit. The auditee management represented that they would analyze the actual situation and would take corrective action as soon as possible. Please refer to BSCI PA 2.2.</p> <p>前次问题点: 经过文件查阅和管理层访谈, 审核员发现被审核方有按照BSCI行为守则的期望制定明确保护工人的长期目标, 但被审核方没有对目标进行追踪。制定及符合保护工人的长期目标是BSCI COC重要的组成部分之一, 它可以帮忙被审核方更好地改善员工的工作环境、工作时间和工资福利等。经过现场走访、管理层访谈和员工访谈, 此次审核发现被审核方的工人处于一个良好的工作环境中。被审核方管理层表示会分析实际的情况尽快采取改善措施。请参看 BSCI PA 2.2 未改善: 经过文件查阅和管理层访谈, 审核员发现被审核方有按照BSCI行为守则的期望制定明确保护工人的长期目标, 但被审核方没有对目标进行追踪。制定及符合保护工人的长期目标是BSCI COC重要的组成部分之一, 它可以帮忙被审核方更好地改善员工的工作环境、工作时间和工资福利等。经过现场走访、管理层访谈和员工访谈, 此次审核发现被审核方的工人处于一个良好的工作环境中。被审核方管理层表示会分析实际的情况尽快采取改善措施。请参看 BSCI PA 2.2</p>	
Remarks from Auditee: None	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:03/12/2020
Good practices Nil	
Areas of improvement <p>The overall observation shows the auditee partially fulfils the requirement of performance area. There was a worker representative committee in the auditee and satisfactory evidence showed that workers elected their representatives freely, and worker representatives met the management every month. According to interview statement with worker representative and workers, they were familiar with workplace-related issues, their labor right e.g. the law, work contracts, job description, working rules. And workers had morning meeting for getting the information of workplace-related issues, the auditee also provided on-board training on workers' right to workers. It has been noted that the auditee had established grievance mechanism: the mechanism consisted of using suggestion boxes, worker representation and an open door policy on coming up with suggestion directly to workers' supervisor. However, gaps had been identified in some implementation.</p> <p>整体观察显示被审核方部分满足该绩效区域的要求。被审核方成立了员工代表委员会, 并且员工自由选出他们的代表, 员工代表每月会定期和管理层见面。根据员工代表及员工的访谈信息, 员工代表以及员工都很清楚被审核方场所相关信息, 以及员工的劳工权利, 例如劳动法, 劳动合同, 工作描述以及厂纪厂规等。同时, 被审核方每天会有早会的方式和员工沟通工厂场所的信息。审核过程发现, 被审核方已建立了申诉政策, 员工可通过意见箱, 员工代表或直接和主管进行沟通等方式提供投诉。所有这些过程均可通过文件以及访谈来核实。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p> <p>2.2 - Per document review and management interview, it was noted that the auditee defined long term goals to protect workers according to the BSCI COC. But the auditee did not trace the goals regularly. Please refer to BSCI PA 2.2. Defined and traced long term goals to protect worker was an important part in BSCI COC, which would be help the auditee to improve working condition, working hours, wage and benefit and so on to employees. Per factory tour, management interview and employees' interview, it was noted that the working condition was in good condition during this audit. The auditee management represented that they would analyze the actual situation and would take corrective action as soon as possible. 经过文件查阅和管理层访谈, 审核员发现被审核方有按照BSCI行为守则的期望制定明确保护工人的长期目标, 但被审核方没有对目标进行追踪。请参看 BSCI PA 2.2 制定及符合保护工人的长期目标是BSCICOC重要的组成部分之一, 它可以帮忙被审核方更好地改善员工的工作环境、工作时间和工资福利等。经过现场走访、管理层访谈和员工访谈, 此次审核发现被审核方的工人处于一个良好的工作环境中。被审核方管理层表示会分析实际的情况尽快采取改善措施。</p>	
Remarks from Auditee	

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit. 备注: 前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。	
Remarks from Auditee:	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u> Nil	
<u>Areas of improvement</u> The overall observation showed that the auditee fully fulfils the requirement of this performance area. Per document review, management interview and employees' private interview, it was noted that the auditee had set procedure to protect the right of workers to form and join organizations of their own choosing. Workers' representatives were allowed to carry out their duties within working hours without losing pay or other negative repercussions. Also representatives could hold negotiation with factory management regarding issues of health and safety, welfare and work condition though no collective bargain was ever held. According to interview with workers' representative, there was no discriminatory treatment from factory management. Also there was no any restriction of workers' representatives' interaction with workers according to employee manual and testimony of interviewees. The auditee could respect this principle the rights of Freedom of Association and Collective Bargaining, and the employees could raise their concerns through, worker representatives, suggestion box or management directly. 整体观察表明, 被审核方满足该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈, 审核发现被审核方制定了相应的程序文件来确保员工可以自由成立或者参与各种组织。员工代表可以在工作时间行使其职责而不会被克扣工资或者产生任何负面影响。员工代表可以代表员工与管理层就健康安全, 员工福利及工作条件等方面进行集体谈判, 虽然目前尚未举办过类似的谈判。根据员工手册及受访者口述, 被审核方没有设置任何制止员工与员工代表接触的措施。被审核方尊重员工的自由结社的权利, 并且员工可以通过员工代表、意见箱或者直接向管理层反映自己的意见或建议。	
<u>Remarks from Auditee</u>	
Performance Area 4 : No Discrimination	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit. 备注: 前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。	
Remarks from Auditee:	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u> Nil	
<u>Areas of improvement</u> The overall observation shows the auditee fully fulfils the requirement of performance area. The auditee made one policy on anti-discrimination. The policy defined that the auditee would not discriminate workers by race, gender and ages etc. And according to interview statement with workers, workers could use the grievance system through suggestion boxes or telling to worker representatives once workers' right was infringed. Furthermore, the policy on discipline measures made by the auditee was in line with legal requirement. All these processes could be verified by document review and interview. 整体观察显示被审核方符合该绩效区域的要求。被审核方制定了反歧视的政策, 反歧视政策中表明被审核方不会因为种族, 性别, 年龄等原因对员工区别对待。并且依照员工访谈, 若员工的权利受到任何侵害, 员工可以通过意见箱和员工代表反馈的形式进行投诉。而且, 通过查看被审核方的惩戒措施程序, 其描述的措施均符合法规和BSCI要求。以上均通过文件审查及访谈得以核实。	
<u>Remarks from Auditee</u>	

Performance Area 5 : Fair Remuneration	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: B	Deadline date:30/11/2021
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: <p>The auditee set up wage and benefit policy, which included paid statutory holidays, sick leave, annual leave, marriage leave and maternity leave etc. Based on the payrolls provided by the auditee, all workers were paid by hourly rate. The basic wage paid by the auditee was at least RMB1720 per month, which was meet the legal requirement. Overtime wages were paid according to legal requirement. Different regular hourly rates were provided to workers according to their skills and work postions. The auditee provided legal paid leaves to all workers and provided social insurances for workers on a voluntary basis. No any illegal deduction was identified according to wages records of workers. However, gaps had been identified in implementation: 被审核方制定了工资支付政策和福利政策, 福利政策包括给员工提供带薪年假, 病假, 产假, 婚假, 产假等假期。根据被审核方提供的工资记录, 所有员工为计时工资。被审核方给员工支付最低每月1720元的基本工资, 符合法规要求。加班费按照法规要求支付。被审核方根据员工不同的岗位及技能提供不同的正班时薪。被审核方为所有员工提供法定的有薪假期, 按照自愿原则为员工提供社会保险。根据员工的工资记录, 员工无不合理扣款项目。被审核方在系统执行方面和BSCI要求尚存在如下差距:</p> <p>5.5 - Previous Finding: According to the social insurance payment receipt provided by auditee management, it was noted that 16 out of 49 (33%) employees were provided with pension and medical insurance and 15 out of 49 (31%) employees were provided with accident, unemployment and maternity insurance in November 2019. Auditee did not provide other commercial accident insurance for employees. Please refer to BSCI PA 5.5 and Article 73 of the Labor Law of the People's Republic of China. Per management and employees' interview, not all employees will to participate in the social insurance. Not Closed: According to the social insurance payment receipt provided by auditee management, it was noted that 16 out of 49 (33%) employees were provided with pension and medical insurance and 15 out of 49 (31%) employees were provided with accident, unemployment and maternity insurance in November 2020. Auditee did not provide other commercial accident insurance for employees. Please refer to BSCI PA 5.5 and Article 73 of the Labor Law of the People's Republic of China. 前次问题点: 审核员发现被审核方的社会保险覆盖不足。根据被审核方提供的2019年11月社会保险缴费单据显示工厂仅为16/49 (33%) 名员工提供了养老和医疗保险, 为15/49 (31%) 提供了工伤, 失业, 生育保险。被审核方没有为员工提供其它商业保险。请参看BSCI PA 5.5 及《中华人民共和国劳动法》第73条。根据管理层和员工访谈, 工厂部分员工不愿意参保。未改善: 审核员发现被审核方的社会保险覆盖不足。根据被审核方提供的2020年11月社会保险缴费单据显示工厂仅为16/49 (33%) 名员工提供了养老和医疗保险, 为15/49 (31%) 提供了工伤, 失业, 生育保险。被审核方没有为员工提供其它商业保险。请参看BSCI PA 5.5 及《中华人民共和国劳动法》第73条。</p>	
Remarks from Auditee: None	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: B	Deadline date:03/12/2020
Good practices Nil	
Areas of improvement <p>The overall observation shows that the auditee partially fulfills the requirements of this performance area. The auditee set up wage and benefit policy, which included paid statutory holidays, sick leave, annual leave, marriage leave and maternity leave etc. Based on the payrolls provided by the auditee, all workers were paid by hourly rate. The basic wage paid by the auditee was at least RMB1720 per month, which was meet the legal requirement. Overtime wages were paid according to legal requirement. Different regular hourly rates were provided to workers according to their skills and work postions. The auditee provided legal paid leaves to all workers and provided social insurances for workers on a voluntary basis. No any illegal deduction was identified according to wages records of workers. However, gaps had been identified in some implementation. 整体观察显示被审核方部分符合该绩效区域的要求。被审核方制定了工资支付政策和福利政策, 福利政策包括给员工提供带薪年假, 病假, 产假, 婚假, 产假等假期。根据被审核方提供的工资记录, 所有员工为计时工资。被审核方给员工支付最低每月1720元的基本工资, 符合法规要求。加班费按照法规要求支付。被审核方根据员工不同的岗位及技能提供不同的正班时薪。被审核方为所有员工提供法定的有薪假期, 按照自愿原则为员工提供社会保险。根据员工的工资记录, 员工无不合理扣款项目。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p> <p>5.5 - According to the social insurance payment receipt provided by auditee management, it was noted that 16 out of 49 (33%) employees were provided with pension and medical insurance and 15 out of 49 (31%) employees were provided with accident, unemployment and maternity insurance in November 2019. Auditee did not provide other commercial accident insurance for employees. Please refer to BSCI PA 5.5 and Article 73 of the Labor Law of the People's Republic of China. Per management and employees' interview, not all employees will to participate in the social insurance. 审核员发现被审核方的社会保险覆盖不足。根据被审核方提供的2019年11月社会保险缴费单据显示工厂仅为16/49 (33%) 名员工提供了养老和医疗保险, 为15/49 (31%) 提供了工伤, 失业, 生育保险。被审核方没有为员工提供其它商业保险。请参看BSCI PA 5.5 及《中华人民共和国劳动法》第73条。根据管理层和员工访谈, 工厂部分员工不愿意参保。</p>	
Remarks from Auditee	

Performance Area 6 : Decent Working Hours	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: D	Deadline date:30/11/2021
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: <p>The auditee established policy about working hour. Workers' working hours were recorded by electronic system. According to the policy and implementation attendance records, all workers worked by one shift (8:00-12:00, 13:30-17:30) with regular working hours for all workers 8 hours per day and 5 days per week. Workers usually had 2 OT hours on weekdays, 8 OT hours on Saturdays and rested on Sundays. However, gaps of overtime had been identified in implementation: 被审核方建立了工作时间的政策。员工通过电子考勤系统记录工作时间。根据工时政策以及被审核方实际执行的考勤记录, 所有员工均为常白班(8:00-12:00, 13:30-17:30)。正班时间为每天8小时, 每周5天。员工一般工作日加班2小时, 周六加班8小时。周日休息。被审核方在系统执行方面和BSCI要求尚存在如下差距:</p> <p>6.2 - Previous Finding: It was noted that 19 out of 20 sample population employees worked in excess of the statutory overtime hour limits. A review of 20 sample population employees' time records (5 samples selected from November 2019 as current completed month, 5 samples selected from October 2019 as current paid month, 5 samples selected from June 2019, 5 samples selected from February 2019) yielded the following: • 4 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 87-91 hours) in November 2019, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 73-76 hours) in October 2019, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 84 hours) in June 2019, which was not in compliance with the legal requirement. • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 40-44 hours) in February 2019, which was not in compliance with the legal requirement. Please refer to BSCI PA6.2 & Article 41 of the Labor Law of the PRC. Not Closed: It was noted that 15 out of 15 sample population employees worked in excess of the statutory overtime hour limits. A review of 15 sample population employees' time records (5 samples selected from October 2020 as current paid month, 5 samples selected from June 2020, 5 samples selected from January 2020) yielded the following: • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 50-62 hours) in October 2020, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 60-64 hours) in June 2020, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 40-48 hours) in January 2020, which was not in compliance with the legal requirement; Please refer to BSCI PA6.2 and Article 41 of the Labor Law of the PRC. 前次问题点: 根据被审核方提供的工时记录, 审核员发现员工加班时间超出了法定标准。审核员从受审核方提供的工时记录中抽取20个样本(从最近完整月2019年11月抽取5个, 从最近支付月份2019年10月抽取5个, 从2019年6月抽取5个, 从2019年2月抽取5个), 发现共有19个样本加班时间超出了法定标准, 具体为: • 4/5名员工在2019年11月的加班时间为87-91小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年10月的加班时间为73-76小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年6月的加班时间为84小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年2月的加班时间为40-44小时, 超过每月加班时间不能超过36小时的法律规定; 请参看BSCI PA 6.2及《中华人民共和国劳动法》第41条 未改善: 根据工厂提供的工时记录, 审核员发现员工加班时间超出了法定标准。审核员从工厂提供的工时记录中抽取15个样本(从最近支付月份2020年10月抽取5个, 从2020年6月抽取5个, 从2020年1月抽取5个), 发现共有15个样本加班时间超出了法定标准, 具体为: • 5/5名员工在2020年10月的加班时间为50-62小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2020年6月的加班时间为60-64小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2020年1月的加班时间为40-48小时, 超过每月加班时间不能超过36小时的法律规定; 请参看BSCI PA 6.2及《中华人民共和国劳动法》第41条</p>	
Remarks from Auditee: None	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: D	Deadline date:03/12/2020
Good practices: Nil	
Areas of improvement <p>The overall observation shows that the auditee partially fulfills the requirements of this performance area. The auditee established policy about working hour. Workers' working hours were recorded by electronic system. According to the policy and implementation attendance records, all workers worked by one shift (8:00-12:00, 13:30-17:30) with regular working hours for all workers 8 hours per day and 5 days per week. Workers usually had 2 OT hours on weekdays, 8 OT hours on Saturdays and rested on Sundays. However, gaps of overtime had been identified in some implementation. 整体观察显示被审核方部分符合该绩效区域的要求。被审核方建立了工作时间的政策。员工通过电子考勤系统记录工作时间。根据工时政策以及被审核方实际执行的考勤记录, 所有员工均为常白班(8:00-12:00, 13:30-17:30)。正班时间为每天8小时, 每周5天。员工一般工作日加班2小时, 周六加班8小时。周日休息。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p> <p>6.2 - It was noted that 19 out of 20 sample population employees worked in excess of the statutory overtime hour limits. A review of 20 sample population employees' time records (5 samples selected from November 2019 as current completed month, 5 samples selected from October 2019 as current paid month, 5 samples selected from June 2019, 5 samples selected from February 2019) yielded the following: • 4 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 87-91 hours) in November 2019, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 73-76 hours) in October 2019, which was not in compliance with the legal requirement; • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 84 hours) in June 2019, which was not in compliance with the legal requirement. • 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 40-44 hours) in February 2019, which was not in compliance with the legal requirement. Please refer to BSCI PA6.2 & Article 41 of the Labor Law of the PRC. 根据被审核方提供的工时记录, 审核员发现员工加班时间超出了法定标准。审核员从受审核方提供的工时记录中抽取20个样本(从最近完整月2019年11月抽取5个, 从最近支付月份2019年10月抽取5个, 从2019年6月抽取5个, 从2019年2月抽取5个), 发现共有19个样本加班时间超出了法定标准, 具体为: • 4/5名员工在2019年11月的加班时间为87-91小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年10月的加班时间为73-76小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年6月的加班时间为84小时, 超过每月加班时间不能超过36小时的法律规定; • 5/5名员工在2019年2月的加班时间为40-44小时, 超过每月加班时间不能超过36小时的法律规定; 请参看BSCI PA 6.2及《中华人民共和国劳动法》第41条</p>	
Remarks from Auditee	

Performance Area 7 : Occupational Health and Safety

1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A

Deadline date:30/05/2021

GOOD PRACTICES:

Nil

AREAS OF IMPROVEMENT:

The auditee identified and collected applicable law requirements. The committee of health and safety was set up by the auditee, which had regular meetings every quarter. For fire safety, the auditee ensured enough extinguishers in every workshop and fire hydrant, emergency lights and fire alarm were available in the factory. All these facilities of fire safety were checked by the EHS officer every month and were effective during the testing on-site. For chemical safety, according to the interviewee statement, workers understood the risk of chemicals and knew to wear related personal protective equipment. For mechanism safety, all processes of operation were set up, workers were trained to operate it correctly. According to the interviewee statement, workers understood well the risk of mechanism and knew to wear related personal protective equipment. For occupational hazards, the auditee issued relevant PPEs to all workers engaged in hazardous working posts. The auditee also set up emergency procedure and trained adequate first aiders for providing the service of first aid. The first aid box was also available in every workshop. Clean potable water was provided with free access to all workers, which was regularly tested to ensure the safety. However, gaps had been identified in implementation as follows:

被审核方识别并收集了相关适用的法律法规，创建了员工的健康安全委员会。该健康安全委员会每季度进行定期会议。在消防安全方面，被审核方给所有车间配备了足够的消防设施，例如灭火器，消防栓，消防警铃等，并且被审核方的EHS负责人每月都会进行检查。审核时经过测试应急灯，消防栓和消防警铃都是有效的。在化学品安全方面，通过访谈车间的员工，员工了解化学品的危害以及操作时需要佩戴相关劳保用品。在机械安全方面，被审核方针对有机机械安全风险的岗位都制定了相应的操作规程，并且给员工提供了培训以防范这方面的风险。通过访谈车间的员工，员工了解机械安全风险和操作时需要佩戴相关劳保用品。在职业危害方面，被审核方为所有接触职业危害岗位的员工提供了相应的劳动保护用品，在急救政策方面，被审核方制定了急救政策。被审核方给每个车间配备了药箱，而且被审核方内培训了足够数量的急救员。同时，被审核方也提供了饮用水给员工，员工可随时喝水，且被审核方定期测试饮用水保证了饮用水的安全卫生。被审核方在系统执行方面和BSCI要求尚存在如下差距：

7.2 - Previous Finding: It was noted that the auditee only provided accident insurance for 15 out of 49 (31%) employees. And no other commercial insurance was provided to employees. Therefore, accident insurance didn't cover all employees. Accident social insurance didn't cover all employees maybe cause the problem between the employer and the employee, which maybe reduce employees' worked efficiency. The auditee management represented that they would enhance the social insurance training to employees and would try their best to improve the purchase rate in the future. Please refer to BSCI PA 7.2 and Article 72 of the Labor Law of the People's Republic of China. **Not Closed:** It was noted that the auditee only provided accident insurance for 15 out of 49 (31%) employees. And no other commercial insurance was provided to employees. Therefore, accident insurance didn't cover all employees. Accident social insurance didn't cover all employees maybe cause the problem between the employer and the employee, which maybe reduce employees' worked efficiency. The auditee management represented that they would enhance the social insurance training to employees and would try their best to improve the purchase rate in the future. Please refer to BSCI PA 7.2 and Article 72 of the Labor Law of the People's Republic of China.

前次问题点： 审核员发现被审核方仅为15/49（31%）提供了工伤保险，并且被审核方没有为员工提供商业保险。因此被审核方的工伤没有覆盖全体员工。没有为全体员工提供工伤保险有可能会引起雇主与雇员之间的问题产生，这有可能会降低员工的工作效率。被审核方管理层表示会加强社保的宣传，尽可能增加社保的购买比例。请参看BSCI PA 7.2 及《中华人民共和国劳动法》第72条。未改善： 审核员发现被审核方仅为15/49（31%）提供了工伤保险，并且被审核方没有为员工提供商业保险。因此被审核方的工伤没有覆盖全体员工。没有为全体员工提供工伤保险有可能会引起雇主与雇员之间的问题产生，这有可能会降低员工的工作效率。被审核方管理层表示会加强社保的宣传，尽可能增加社保的购买比例。请参看BSCI PA 7.2 及《中华人民共和国劳动法》第72条。

7.4 - Previous Finding: It was noted that workers were not involved in the risk assessment and establishment of OHS policy. The management did not invited the employees to took part into the participate in suggesting and making factory OHS policies. The auditee management stated that they were not aware of the requirement, but they would take corrective action as soon as possible. Please refer to BSCI PA7.4. **Not Closed:** It was noted that workers were not involved in the risk assessment and establishment of OHS policy. The management did not invited the employees to took part into the participate in suggesting and making factory OHS policies. The auditee management stated that they were not aware of the requirement, but they would take corrective action as soon as possible. Please refer to BSCI PA7.4.

前次问题点： 审核员发现被审核方的危险评估和职业健康安全政策的制定没有员工的参与。被审核方管理层没有邀请员工参与建议和制定工厂相关的OHS政策。被审核方表示不了解此项要求，表示会尽快改善。请参看BSCI PA7.4 未改善： 审核员发现被审核方的危险评估和职业健康安全政策的制定没有员工的参与。被审核方管理层没有邀请员工参与建议和制定工厂相关的OHS政策。被审核方表示不了解此项要求，表示会尽快改善。请参看BSCI PA7.4

7.5 - Previous Finding: It was noted that the auditee provided on-the-job occupational health checks to employees who were in contact with hazardous materials yearly. But the auditee did not provide pre-job occupational health checks to 6 out of 7 employees. During this audit, it was noted that about 14% employees were in hazardous position. And the facility had provided relevant training to employees. The occupational health checks to employees would help the facility management know the situation about employees, which could prevent occupational disease from happening. The facility management represented that they would try their best to correct this issue. Please refer to BSCI PA 7.5 and Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases **Closed:** The factory provided pre-job, on-the-job and off-the-job occupational health checks for all hazardous positions' workers.

前次问题点： 被审核方有为接触有毒有害物质的员工提供定期的职业病体检，但未提供岗前职业病体检给6/7名员工。此次审核发现被审核方约有14%的员工在危险岗位，工厂有定期为这些员工提供培训。职业体检可以让工厂及时了解员工的健康，以防止员工职业病的产生。工厂管理层表示会尽可能改善。请参看BSCI PA7.5和《中华人民共和国职业病防治法》第35条 已改善： 工厂为危害岗位员工提供了岗前，在岗及离岗职业健康体检。

7.9 - New Finding: It was noted that the factory did not post the warning sign for 1 electricity box at workshop. The factory posted the warning sign for other electricity boxes. Please refer to BSCI PA 7.9 and Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008.

新问题点： 工厂生产车间1个电箱没有张贴警示标志。其它电箱有张贴警示标志。请参看BSCI PA 7.9 及《安全标志及使用导则(GB 2894-2008)》警示标志2-7

7.21 - Remark: No kitchen or canteen was provided by the factory and employees were eating outside freely.

备注： 工厂没有提供餐厅和厨房给员工，员工自由在外面吃饭。

7.23 - Remark: No transportation was provided to workers.

备注： 工厂没有为员工提供交通服务。

7.24 - Remark: No dormitory in the factory.

备注： 工厂没有为员工提供宿舍。

Remarks from Auditee:

None

Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A

Deadline date:03/06/2020

Good practices

Nil	
<u>Areas of improvement</u>	
<p>The overall observation shows that the auditee partially fulfills the requirements of this performance area. The auditee identified and collected applicable law requirements. The committee of health and safety was set up by the auditee, which had regular meetings every quarter. For fire safety, the auditee ensured enough extinguishers in every workshop and fire hydrant, emergency lights and fire alarm were available in the factory. All these facilities of fire safety were checked by the EHS officer every month and were effective during the testing on-site. For chemical safety, according to the interviewee statement, workers understood the risk of chemicals and knew to wear related personal protective equipment. For mechanism safety, all processes of operation were set up, workers were trained to operate it correctly. According to the interviewee statement, workers understood well the risk of mechanism and knew to wear related personal protective equipment. For occupational hazards, the auditee issued relevant PPEs to all workers engaged in hazardous working posts. The auditee also set up emergency procedure and trained adequate first aiders for providing the service of first aid. The first aid box was also available in every workshop. Clean potable water was provided with free access to all workers, which was regularly tested to ensure the safety. However, gaps had been identified in some implementation.</p> <p>整体观察显示被审核方部分符合该绩效区域的要求。被审核方识别并收集了相关适用的法律法规，创建了员工的健康安全委员会。该健康安全委员会每季度进行定期会议。在消防安全方面，被审核方给所有车间配备了足够的消防设施，例如灭火器，消防栓，消防警铃等，并且被审核方的EHS负责人每月都会进行检查。审核时经过测试应急灯，消防栓和消防警铃都是有效的。在化学品安全方面，通过访谈车间的员工，员工了解化学品的危害以及操作时需要佩戴相关劳保用品。在机械安全方面，被审核方针对有机机械安全风险的岗位都制定了相应的操作规程，并且给员工提供了培训以防范这方面的风险。通过访谈车间的员工，员工了解机械安全风险和操作时需要佩戴相关劳保用品。在职业危害方面，被审核方为所有接触职业危害岗位的员工提供了相应的劳动保护用品，在急救政策方面，被审核方制定了急救政策。被审核方给每个车间配备了药箱，而且被审核方内培训了足够数量的急救员。同时，被审核方也提供了饮用水给员工，员工可随时喝水，且被审核方定期测试饮用水保证了饮用水的安全卫生。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p>	
7.2 -	<p>It was noted that the auditee only provided accident insurance for 15 out of 49 (31%) employees. And no other commercial insurance was provided to employees. Therefore, accident insurance didn't cover all employees. Please refer to BSCI PA 7.2 and Article 72 of the Labor Law of the People's Republic of China. Accident social insurance didn't cover all employees maybe cause the problem between the employer and the employee, which maybe reduce employees' worked efficiency. The auditee management represented that they would enhance the social insurance training to employees and would try their best to improve the purchase rate in the future.</p> <p>审核员发现被审核方仅为15/49（31%）提供了工伤保险，并且被审核方没有为员工提供商业保险。因此被审核方的工伤没有覆盖全体员工。请参看BSCI PA 7.2及《中华人民共和国劳动法》第72条。没有为全体员工提供工伤保险有可能会引起雇主与雇员之间的问题产生，这有可能会降低员工的工作效率。被审核方管理层表示会加强社保的宣传，尽可能增加社保的购买比例。</p>
7.4 -	<p>It was noted that workers were not involved in the risk assessment and establishment of OHS policy. Please refer to BSCI PA7.4. The management did not invited the employees to took part into the participate in suggesting and making factory OHS policies. The auditee management stated that they were not aware of the requirement, but they would take corrective action as soon as possible.</p> <p>审核员发现被审核方的危险评估和职业健康安全政策的制定没有员工的参与。请参看BSCI PA7.4被审核方管理层没有邀请员工参与建议和制定工厂相关的OHS政策。被审核方表示不了解此项要求，表示会尽快改善。</p>
7.5 -	<p>It was noted that the auditee provided on-the-job occupational health checks to employees who were in contact with hazardous materials yearly. But the auditee did not provide pre-job occupational health checks to 6 out of 7 employees. Please refer to BSCI PA 7.5 and Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases During this audit, it was noted that about 14% employees were in hazardous position. And the facility had provided relevant training to employees. The occupational health checks to employees would help the facility management know the situation about employees, which could prevent occupational disease from happening The facility management represented that they would try their best to correct this issue.</p> <p>被审核方有为接触有毒有害物质的员工提供定期的职业病体检，但未提供岗前职业病体检给6/7名员工。请参看BSCI PA7.5和《中华人民共和国职业病防治法》第35条。此次审核发现被审核方约有14%的员工在危险岗位，工厂有定期为这些员工提供培训。职业体检可以让工厂及时了解员工的健康，以防止员工职业病的产生。工厂管理层表示会尽可能改善。</p>
7.23 -	Remark: N/A. No transportation was provided for employees.
<u>Remarks from Auditee</u>	

Performance Area 8 : No Child Labour	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES:	
Nil	
AREAS OF IMPROVEMENT:	
<p>Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit.</p> <p>备注：前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。</p>	
<u>Remarks from Auditee:</u>	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u>	
Nil	
<u>Areas of improvement</u>	
<p>The overall observation showed that auditee fully fulfills the requirement of this performance area. Per auditee tour, document review, management interview and employees' private interview, it was noted that the auditee established its child labor forbidden policy. It was noted that the HR related officer had to check the ID and age during the hiring process. Through management interview, worker representative interview and employee interview, all knew the child labor forbidden policy and confirmed no child labor in the auditee.</p> <p>整体观察表明，被审核方符合该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈，审核发现被审核方建立了禁止童工政策。负责招聘的相关HR人员知道他们必须严格核实新员工的年龄。员工面谈，员工代表面谈和管理层面谈都证实清楚的知晓禁止童工政策并且确定被审核方没有童工。</p>	
<u>Remarks from Auditee</u>	

Performance Area 9 : Special protection for young workers	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit. 备注: 前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。	
Remarks from Auditee:	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u> Nil	
<u>Areas of improvement</u> The overall observation showed that the auditee fulfills the requirement of this performance area. Per auditee tour, document review, management interview and employees' private interview, it was noted that the auditee had established Young Worker Management Procedure which established necessary mechanisms to prevent, identify and mitigate harm to young workers. Moreover, in the grievance mechanisms it was regulated that workers can lodge grievances if there was young worker not identified or not protected. Through management and workers review, site observation and document review, no young worker was hired by this auditee at present. 整体观察表明, 被审核方符合该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈, 审核发现工厂建立了预防、识别和减轻对未成年工伤害的未成年工特殊保护程序, 并有未成年工的申诉机制来全部该程序执行。在本次审核中没有发现未成年工。	
Remarks from Auditee	
Performance Area 10 : No Precarious Employment	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit. 备注: 前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。	
Remarks from Auditee:	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u> Nil	
<u>Areas of improvement</u> The overall observation showed that the auditee fully fulfills the requirement of this performance area. Per factory tour, document review, management interview and employees' private interview, it was noted that the auditee established human resource management procedures which regulated the standard of recruitment, remuneration, hours of work, disciplinary measures, promotion, trainings, termination of employment. As per interviewed workers, they all stated that they had understandable information of the auditee before entering into employment. The auditee signed labour contracts with employees within one month of recruitment according to legal requirement. The auditee did not use temporary job arrangements to cover workloads that lack pre-determined end dates. 整体观察表明, 被审核方符合该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈, 审核发现被审核方建立了人力资源管理程序, 涵盖了人员招聘, 薪资, 工时, 奖惩, 晋升, 培训, 解除合同等各方面的规定。根据员工访谈, 工人在应聘进入被审核方前就对被审核方各方面信息有了了解。被审核方在员工入职一个月内与员工签订了劳动合同。没有采取雇佣临时工来完成长期任务的情况。	
Remarks from Auditee	

Performance Area 11 : No Bonded Labour	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:
GOOD PRACTICES:	
Nil	
AREAS OF IMPROVEMENT:	
<p>Remark: No any non-compliance was raised in the previous audit, so this PA was not included in this follow-up audit scope. The rating in this PA remained unchanged just as it was in the previous audit.</p> <p>备注： 前次审核中该执行领域未发现问题点。此次跟进审核未评审该执行领域。该执行领域等级保持不变。</p>	
Remarks from Auditee:	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:
<u>Good practices</u>	
Nil	
<u>Areas of improvement</u>	
<p>The overall observation showed that the auditee fully fulfills the requirement of this performance area. Per auditee tour, document review, management interview and employees' private interview, it was noted that the auditee did not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour according to workers interview, review of management manual, grievance log and onsite observation. Auditee did not keep any original documents from the workers or collect any deposit upon hiring. According to interview with management and supervisors, they were all aware of the procedures regarding anti-bonded labour. Workers were not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse according to interviewed workers.</p> <p>整体观察表明，被审核方符合该绩效区域的要求。通过文件查阅、管理层访谈和员工访谈，审核发现被审核方没有有使用奴役，强迫，担保，契约卖身，贩卖人口或其他非自愿劳工的情况。被审核方在招工时尚未收取任何形式的押金，也没有扣押员工证件。管理人员和现场主管均表示知晓反强迫劳工的相关管理规定。受访员工表示未受到任何非人道待遇，以及体罚，精神及身体虐待和语言辱骂等。</p>	
Remarks from Auditee	

Performance Area 12 : Protection of the Environment	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:30/11/2021
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: <p>The auditee had established procedures on Protection of Environment. The water used by the auditee was come from municipal water. The auditee had established procedure on Energy and Water Saving procedure and kept statistic logs of water consumption. However, gaps had been identified in implementation: 被审核方建立了环境保护的程序。被审核方主要使用当地市政提供的自来水。被审核方建立了节约能源和水资源的程序并保留了水资源消耗统计记录。被审核方在系统执行方面和BSCI要求尚存在如下差距:</p> <p>12.1 - Previous Finding: It was noted that the auditee did not work out the report form of environmental impacts of the construction of the facility for review. No the report form of environmental impacts of the construction of the auditee could not certificate the auditee compliance with the local environment requirement. Please refer to BSCI PA 12.1 and Article 16 of Law of the People's Republic of China on Appraising of Environment Impacts. Closed: The factory provided environmental impacts assessment report for review. 前次问题点: 审核发现被审核方没有提供环评文件以供查阅。没有环评文件就不能提供被审核方已经符合了当地环境要求。请参看BSCI PA12.1和《中华人民共和国环境影响评价法》第16条 已改善: 工厂提供了环境影响评估报告。</p> <p>12.3 - Previous Finding 1: It was noted that auditee management was unable to provide the approval document of environment impact assessment for review. No the approval document of environment impact assessment could not certificate the auditee compliance with the local environment requirement. Please refer to BSCI PA 12.3 and Article 22 of Law of the People's Republic of China on Appraising of Environment Impacts. Closed: The factory provided approval document of environment impact assessment for review. Previous Finding 2: It was noted that auditee management was unable to provide the approval document for on-site inspection and acceptance of completed environmental protection facilities for review. No the approval document for on-site inspection and acceptance of completed environmental protection facilities could not certificate the auditee compliance with the local environment requirement. Please refer to BSCI PA 12.3 & Article 9 of the Regulations on Environmental Protection Check and Acceptance for Completed Construction Project. Not Closed: It was noted that auditee management was unable to provide the approval document for on-site inspection and acceptance of completed environmental protection facilities for review. No the approval document for on-site inspection and acceptance of completed environmental protection facilities could not certificate the auditee compliance with the local environment requirement. Please refer to BSCI PA 12.3 & Article 9 of the Regulations on Environmental Protection Check and Acceptance for Completed Construction Project. 前次问题点1: 审核发现被审核方不能提供建设项目环境影响评价批复文件供审核。没有环评批复文件就不能提供被审核方已经符合了当地环境要求。请参看BSCI PA12.3和《中华人民共和国环境影响评价法》第22条 已改善: 工厂提供了建设项目环境影响评价批复文件供审核。前次问题点2: 审核发现被审核方未能提供建设项目竣工环境保护验收文件以供查阅。没有环评验收文件就不能提供被审核方已经符合了当地环境要求。请参看BSCI PA 12.3的要求及《建设项目竣工环境保护验收管理办法》第9条。未改善: 审核发现被审核方未能提供建设项目竣工环境保护验收文件以供查阅。没有环评验收文件就不能提供被审核方已经符合了当地环境要求。请参看BSCI PA 12.3的要求及《建设项目竣工环境保护验收管理办法》第9条。</p>	
Remarks from Auditee: None	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: B	Deadline date:03/12/2020
Good practices Nil	
Areas of improvement <p>The overall observation showed the auditee partially fulfilled the requirement of performance area. The auditee had established procedures on Protection of Environment. The water used by the auditee was come from municipal water. The auditee had established procedure on Energy and Water Saving procedure and kept statistic logs of water consumption. However, gaps had been identified in some implementation. 整体观察显示被审核方部分符合该绩效区域的要求。被审核方建立了环境保护的程序。被审核方主要使用当地市政提供的自来水。被审核方建立了节约能源和水资源的程序并保留了水资源消耗统计记录。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p> <p>12.1 - It was noted that the auditee did not work out the report form of environmental impacts of the construction of the facility for review. Please refer to BSCI PA 12.1 and Article 16 of Law of the People's Republic of China on Appraising of Environment Impacts. No the report form of environmental impacts of the construction of the auditee could not certificate the auditee compliance with the local environment requirement. 审核发现被审核方没有提供环评文件以供查阅。请参看BSCI PA12.1和《中华人民共和国环境影响评价法》第16条 没有环评文件就不能提供被审核方已经符合了当地环境要求。</p> <p>12.3 - 1. It was noted that auditee management was unable to provide the approval document of environment impact assessment for review. Please refer to BSCI PA 12.3 and Article 22 of Law of the People's Republic of China on Appraising of Environment Impacts. No the approval document of environment impact assessment could not certificate the auditee compliance with the local environment requirement. 2. It was noted that auditee management was unable to provide the approval document for on-site inspection and acceptance of completed environmental protection facilities for review. Please refer to BSCI PA 12.3 & Article 17 of the Regulations on Environmental Protection Check and Acceptance for Completed Construction Project. No the approval document for on-site inspection and acceptance of completed environmental protection facilities could not certificate the auditee compliance with the local environment requirement. 1.审核发现被审核方不能提供建设项目环境影响评价批复文件供审核。请参看BSCI PA12.3和《中华人民共和国环境影响评价法》第22条 没有环评批复文件就不能提供被审核方已经符合了当地环境要求。 2.审核发现被审核方未能提供建设项目竣工环境保护验收文件以供查阅。请参看BSCIPA12.3的要求及《建设项目竣工环境保护验收管理办法》第17条。没有环评验收文件就不能提供被审核方已经符合了当地环境要求。</p>	
Remarks from Auditee	

Performance Area 13 : Ethical Business Behaviour	
1- Followup Audit [Audit Id - 199352] Audit Date: 30/11/2020 PA Score: A	Deadline date:30/03/2021
GOOD PRACTICES: Nil	
AREAS OF IMPROVEMENT: <p>Per auditee tour, document review, management interview and employees' private interview, it was noted that the auditee has set up appropriate measures to ensure and demonstrate no corruption, extortion, embezzlement, bribery, falsified information or misrepresentation in the supply chain. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context and policies/procedures against any act of corruption and takes active measures to prevent and remediate them. However, gaps had been identified in implementation as follows:</p> <p>通过文件查阅、管理层访谈和员工访谈，审核发现被审核方建立了合适的管理措施来确保及明确在供应链中不能存在行贿索贿，挪用盗用公款，贪污，提供虚假资料，虚报等行为。在管理制度中明确了在哪些方面可能存在贪污，挪用公款或者贿赂等行为以及相应的预防管理措施。被审核方在系统执行方面和BSCI要求尚存在如下差距：</p> <p>13.1 - Previous Finding: Auditee conducted risk assessment on corruption, but the prevention measures of all risks were the same, such as setting supervisory phone and conduct joint meeting, etc. Pleaserefer to BSCI PA 13.1 Not Closed: Auditee conducted risk assessment on corruption, but the prevention measures of all risks were the same, such as setting supervisory phone and conduct joint meeting, etc. Pleaserefer to BSCI PA 13.1</p> <p>前次问题点：被审核方进行了廉政风险评估，但所有风险的预防措施都是相同的，例如设置监督电话和设置联席会议等。请参看BSCI PA 13.1 未改善：被审核方进行了廉政风险评估，但所有风险的预防措施都是相同的，例如设置监督电话和设置联席会议等。请参看BSCI PA 13.1</p>	
Remarks from Auditee: None	
Full Audit [Audit Id - 169249] Audit Date: 03/12/2019 PA Score: A	Deadline date:03/12/2020
Good practices Nil	
Areas of improvement <p>The overall observation showed that the auditee partially fulfills the requirement of this performance area. Per auditee tour, document review, management interview and employees' private interview, it was noted that the auditee has set up appropriate measures to ensure and demonstrate no corruption, extortion, embezzlement, bribery, falsified information or misrepresentation in the supply chain. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context and policies/procedures against any act of corruption and takes active measures to prevent and remediate them. However, gaps had been identified in some implementation.</p> <p>整体观察表明，被审核方部分满足这个绩效区域的要求。通过文件查阅、管理层访谈和员工访谈，审核发现被审核方建立了合适的管理措施来确保及明确在供应链中不能存在行贿索贿，挪用盗用公款，贪污，提供虚假资料，虚报等行为。在管理制度中明确了在哪些方面可能存在贪污，挪用公款或者贿赂等行为以及相应的预防管理措施。被审核方在系统执行方面和BSCI要求尚存在一些差距。</p> <p>13.1 - Auditee conducted risk assessment on corruption, but the prevention measures of all risks were the same, such as setting supervisory phone and conduct joint meeting, etc. Pleaserefer to BSCI PA 13.1</p> <p>被审核方进行了廉政风险评估，但所有风险的预防措施都是相同的，例如设置监督电话和设置联席会议等。请参看BSCI PA 13.1</p>	
Remarks from Auditee	

Summary 

Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Follow-up Audit	30/11/2020	199352	C	A	A	A	B	D	A	A	A	A	A	A	A	C
Full Audit	03/12/2019	169249	C	A	A	A	B	D	A	A	A	A	A	B	A	C

Producer Photos



External photo(s) of the production unit(s)
7.3 electricity box without warning sign.JPG



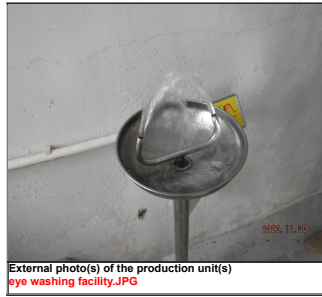
External photo(s) of the production unit(s)
exit sign and emergency lighting.JPG



External photo(s) of the production unit(s)
packing.JPG



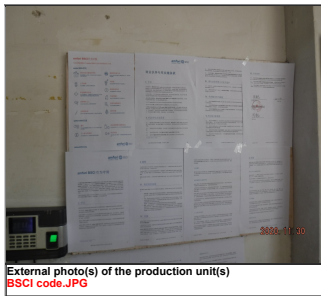
External photo(s) of the production unit(s)
attendance record machine.JPG



External photo(s) of the production unit(s)
eye washing facility.JPG



External photo(s) of the production unit(s)
printing.JPG



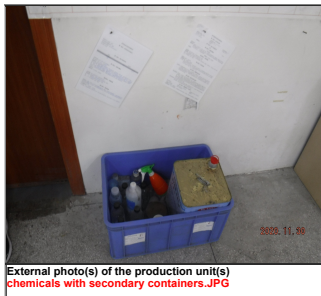
External photo(s) of the production unit(s)
BSCI code.JPG



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



External photo(s) of the production unit(s)
production building.JPG



External photo(s) of the production unit(s)
chemicals with secondary containers.JPG



External photo(s) of the production unit(s)
fire alarm.JPG



External photo(s) of the production unit(s)
sewing.JPG



External photo(s) of the production unit(s)
cutting.JPG



External photo(s) of the production unit(s)
fire hydrant fire extinguisher and evacuation indicating lamp.JPG



External photo(s) of the production unit(s)
suggestion box.JPG

