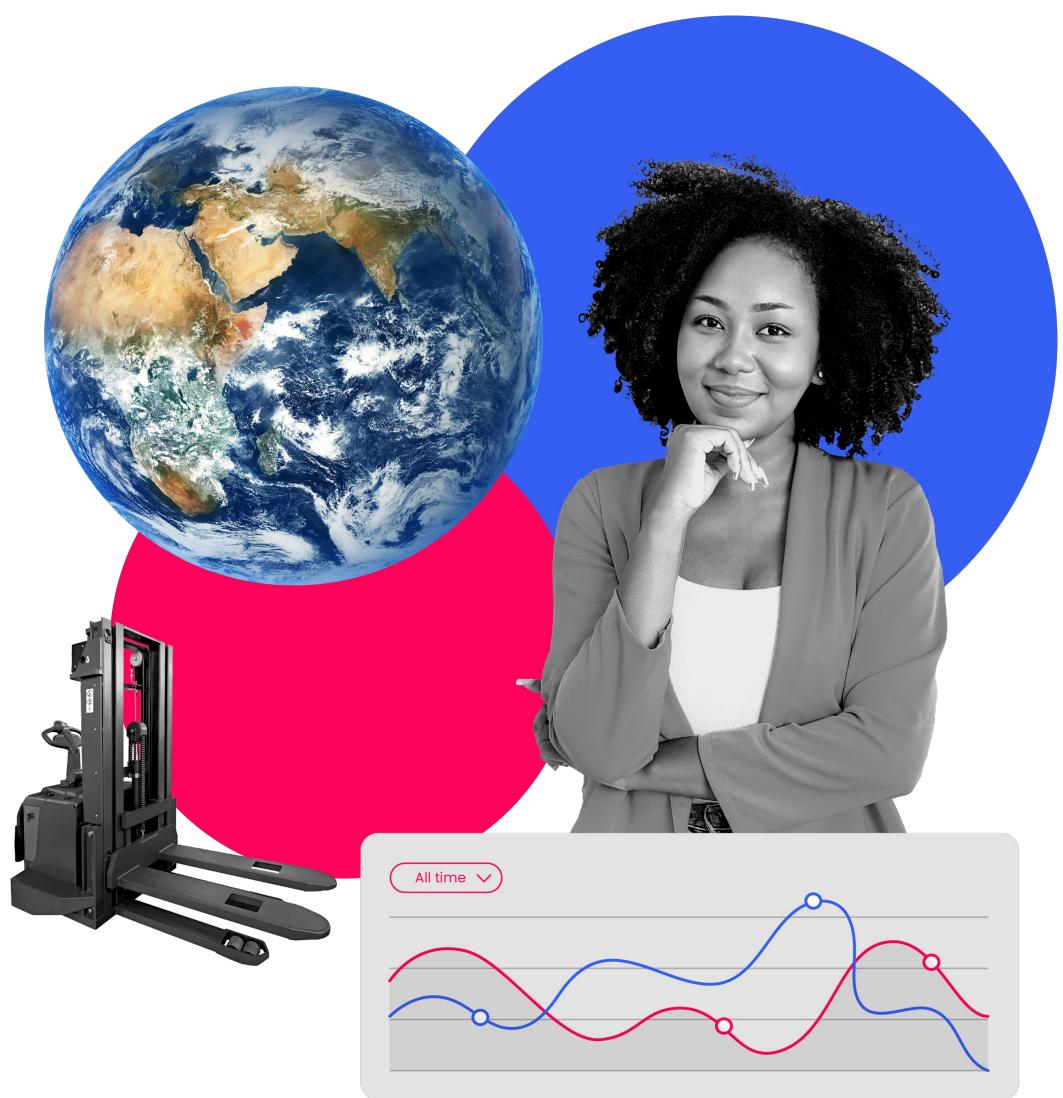




# Sedex Members Ethical Trade Audit Report

Version 7



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9. No harsh or inhumane treatment is allowed

10.A. Environment 2-Pillar

10.B. Environment 4-Pillar

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Attachments

# Audit content

**(1)** A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

## Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

## Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

**(2)** Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

**(3)** Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit and site details

## Audit details

<b>Sedex company reference</b>	ZC5000060104	<b>Auditor company name</b>	BUREAU VERITAS CPS - ASIA
<b>Date of audit</b>	2025-04-21	<b>Audit conducted by</b>	Sedex member
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

## Site details

<b>Sedex site reference</b>	ZS1000071270	<b>Site name</b>	Wenzhou Hui Feng Shoes Technology Co Ltd
<b>Business name</b>	Wenzhou Hui Feng Shoes Technology Co Ltd	<b>Site address</b>	325105 浙江省温州市永嘉县瓯北街道五星路952号 No. 952 Wuxing Road, Oubei Street, Yongjia County, Wenzhou City, Zhejiang Province, WENZHOU, CN
<b>Site phone</b>	18958250017	<b>Site email</b>	481898327@qq.com

# Audit parameters

<b>Time in and out</b>	Day 1	Day 2
	In 09:00	In 09:00
	Out 17:30	Out 13:00
<b>Audit type</b>	Full initial	
<b>Was the audit announced?</b>	Semi announced	
<b>Was the Sedex SAQ available for review?</b>	Yes	
<b>Who signed and agreed CAPR?</b>	Mr. Qiu / General Manager	
<b>Any conflicting information SAQ/Pre-Audit Info</b>	No	
<b>Is further information available?</b>	No	

## Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	No Union Representative was in factory		
<b>Reason for absence during the audit</b>	No Union Representative was in factory		
<b>Reason for absence at the closing meeting</b>	No Union Representative was in factory		

# SMETA declaration

## Auditor team

### SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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

### Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

The semi-announced window of this audit is from Apr 14, 2025 to May 7, 2025.

### Lead auditor

Peter A Chen

### APSCA Number

21705041

### Additional auditor

### Date of declaration

2025-04-22

## Site representation

<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Mr. Qiu
<b>Title</b>	General Manager
<b>Date of declaration</b>	2025-04-22

## Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600905922</a>
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§2	NC <a href="#">ZAF600905923</a>
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in... 3.R Provide clean and secure toilets, wash ar... 3.N Maintain a log of all hazardous substance... 3.H Where identified as necessary to reduce r... 3.M Ensure all machinery is installed, mainta...	§3 §4 §5 §6 §7	NC <a href="#">ZAF600905924</a> NC <a href="#">ZAF600905925</a> NC <a href="#">ZAF600905926</a> NC <a href="#">ZAF600905927</a> NC <a href="#">ZAF600905928</a>

# Local law issues

§1

根据《中华人民共和国职业病防治法》第35条：根据《中华人民共和国职业病防治法》第35条：从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。职业健康检查费用由用人单位承担。用人单位不得安排未经上岗前职业健康检查的劳动者从事接触职业病危害的作业；不得安排有职业禁忌的劳动者从事其所禁忌的作业；对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者，应当调离原工作岗位，并妥善安置；对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。职业健康检查应当由取得《医疗机构执业许可证》的医疗卫生机构承担。卫生行政部门应当加强对职业健康检查工作的规范管理，具体管理办法由国务院卫生行政部门制定。 Legal Requirement: In accordance with Article 35 of the People's Republic of China on the Prevention and Treatment of Occupational Diseases, for the laborers that are engaged in the operations contacting the harm of occupational diseases, the employing work unit shall organize the occupational health examination of the laborers before they take the posts, when they are at the posts and when they leave the posts, the employing work unit shall inform the laborers of the examination results. The employing work unit shall afford the expenses needed for the occupational health examination. The employing work unit may not assign the laborers that haven't gone through the pre-post occupational health examination to undertake the operations involving the harm of occupational diseases; may not assign the laborers that have occupational contraindications to undertake the operations that they shall avoid; the laborers that are found to have the health injuries related to their posts during the occupational health examination shall be transferred from their former posts and be settled appropriately; and the employing work unit may not cancel or terminate the labor contacts signed with the laborers that haven't gone through the occupational health examination before they leave their posts.

§2

根据《仓库防火安全管理规则》第18条：库存物品应当分类、分类储存，每垛占地面积不宜大于100平方米，垛与垛间距不小于1米，垛与墙间距不小于0.5米，垛与梁、柱的间距不小于0.3米，主要通道的宽度不小于2米。 Legal Requirement: In accordance with Article 18 of Rules for Storage Fire Prevention Safety Management: The goods in storage should be classified for storage. The area occupied by any single stack shall preferably not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.

§3

In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antisepsis, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof. 根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。

§4

根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。 Legal Requirement: In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.

§5

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices. 根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。

§6

根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：(一)退休；(二)患病、负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。 Legal Requirement: In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers are entitled to, must be timely paid in full amount.

§7

根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。 Legal Requirement: In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	✓	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	✓	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	✓
3. Working conditions are safe and hygienic	✓	✓	✓	ⓘ
4. Child labour shall not be used	✓	✓	✓	✓
5. Legal wages are paid	✓	✓	✓	⚠
6. Working hours are not excessive	✓	✓	✓	⚠
7. No discrimination is practiced	✓	✓	✓	✓
8. Regular employment is provided	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✓	✓	✓	✓
9. No harsh or inhumane treatment is allowed	✓	✓	✓	✓
10.A. Environment 2-Pillar	✓	✓	✓	✓
10.C. Business ethics	✓	✓	✓	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

# Site details

## Company and site details

Sedex company reference	ZC5000060104	
Sedex site reference	ZS1000071270	
Company name	Wenzhou Hui Feng Shoes Technology Co Ltd	
Business ownership type	GOODS	
Site name	Wenzhou Hui Feng Shoes Technology Co Ltd	
Site name in local language	温州汇峰鞋业科技有限公司	
GPS location	<b>GPS address</b> NO.952 WUXING ROAD, OUBEI DISTRICT, YONGJIA County, WENZHOU CITY, Zhejiang Province, China	
	<b>Coordinates</b> Latitude: 28°2'45" N Longitude: 120°35'44" E	
Is the worksite in a remote location, far from habitation?	No	
Site contact	<b>Contact name</b> Mr. Qiu Honghan <b>Job title</b> General Manager <b>Phone number</b> 18958250017 <b>Email</b> 481898327@qq.com	
Applicable business and other legally required business license numbers and documents	1. Business license no: 91330324MA2ARG3K3Q, valid from Mar 15, 2019 to Mar 14, 2039. 2. Fire Protection Registration Record dated Jan, 2021 3. Certificate of inspection for completed building construction projects dated 24 Dec, 2020	

## Site activities

Site function	Factory Processing/Manufacturer
---------------	---------------------------------

## Site activities

<b>Site activities</b>	<b>Primary</b>	Manufacture of footwear
	<b>Secondary</b>	
	<b>Other</b>	
<b>Product type</b>	Products: Shoes Main activities: sewing, moulding, cutting, gluing, assembly and packing	
<b>Process overview</b>	Products: Products: Shoes Main activities: sewing, moulding, cutting, gluing, assembly and packing Number of production lines: 2 production lines Main equipment used: moulding machine, sewing machine, cutting machine, etc.	
<b>What level of mechanization best describes the work at this site?</b>	Fair mechanisation / manual Labour	

## Site scope

<b>Is the audited site a physically continuous area?</b>	No	Only partially of 1st floor was rent to other factory as warehouse. According to per factory tour, they had own business line and employees. The lease agreement was provided for review.
<b>Building 1</b>	<b>Last construction works on site</b>	2020
	<b>If building is shared, provide details</b>	partially of 1st floor was rent to other factory as warehouse
	<b>Number of floors</b>	6
	<b>Description of floor activities</b>	1F: Parking, other factory as warehouse 2F: Warehouse, packing 3F: Moulding, assembly 4F: Sewing 5F: Cutting, warehouse 6F: Idle
<b>Is there any difference between the site scope of the audit and the Sedex site profile?</b>	No	
<b>Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?</b>	No	

## Site scope

Is any activity conducted onsite not included within the scope of the audit? No

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

Does the site organise worker transport to the worksite? Not applicable

No transport was provided by the factory. Not required by local law.

## Work patterns

Approximate workers on site per month (% of peak)	January	90-95%	February	90-95%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night shift work at the site? No

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No

No local requirement. The factory did not assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No

No local requirement. No such assessment was conducted.



# Worker analysis

Gender disaggregated data available Men and women

## Worker totals

	Men	Women	Other	Total
<b>Number of workers</b>	51 (60.7%)	33 (39.3%)	- -	84 (100%)

## Workers by type

	Men	Women	Other	Total
<b>Permanent workers (employees)</b>	51 (60.7%)	33 (39.3%)	- -	84 (100%)
<b>Temporary or fixed term employees</b>	0 -	0 -	- -	0 (0%)
<b>Agency or subcontracted workers</b>	0 -	0 -	- -	0 (0%)
<b>Seasonal workers</b>	0 -	0 -	- -	0 (0%)
<b>Self-employed workers</b>	0 -	0 -	- -	0 (0%)
<b>Informal workers including home workers</b>	0 -	0 -	- -	0 (0%)
<b>Apprentices, trainees or interns</b>	0 -	0 -	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
<b>Domestic migrant workers</b>	46 (59%)	32 (41%)	- -	78 (92.9%)
<b>International migrant workers</b>	0 -	0 -	- -	0 (0%)
<b>Total migrant workers</b>	46 (59%)	32 (41%)	- -	78 (92.9%)

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Yunnan, Henan, Guizhou etc. Provinces

## Workers by age

	Men	Women	Other	Total
<b>18 - 24 years old</b>	2 (66.7%)	1 (33.3%)	- -	3 (3.6%)
<b>15 - 17 years old</b>	0 -	0 -	- -	0 (0%)
<b>Under 15 years old</b>	0 -	0 -	- -	0 (0%)

\* % of total workforce

**Is the worker analysis data relevant for peak season and current to the audit?** No

**Describe how this may vary during peak periods** The peak season was not obvious in the factory.

**Please list the nationalities of all workers, with the three most common nationalities listed first** Chinese

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	61%	39%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	51 (60.7%)	33 (39.3%)	- -	84 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	51 (60.7%)	33 (39.3%)	- -	84 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details

NA. All employees were paid hourly as a cycle.

## People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
<b>Employees in management positions</b>	2 (100%)	0 (0%)	- -	2
<b>Supervisors or team leaders</b>	1 (100%)	0 (0%)	- -	1
<b>Administrative staff</b>	1 (50%)	1 (50%)	- -	2

# Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews  
Group interviews

## Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-
Were any of the audit findings attributable to the survey?				
Was the interview sample representative of all types of nationality and employment types of workers?	Yes			
Was the interview sample representative of the gender composition of the workforce?	Yes			
Number and size of group interviews	1 groups of 5 employees			
Did workers understand the purpose of the audit?	Yes			
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes			
Was there any indication that workers had been 'coached' in how they should respond to questions?	No			
What was the general attitude of the workers towards their workplace?	Favorable			

## Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details)  No concerns or complaints was raised.
What did the workers like the most about working at this site?	Overtime Facilities (e.g. rest area, recreation, canteen) Hours worked, rest days or breaks Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Communication (e.g. from management) Equal opportunities Social dialogue (e.g. freedom to associate) Grievance mechanisms Freedom of movement Pay
Additional comments	All workers stated that they were satisfied with their employment at the factory and current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They felt able to complain directly to their managers and also felt free to give their general concerns, such as working conditions to their worker representative who would take it to the worker management committee. Apart from the 10 workers interviewed listed in the worker analysis table, another 2 employees were interviewed for business ethics and 2 employees for environment as this is a 4-pillar audit.
Attitude of workers' committee/union representatives	The representative of worker committee stated that the working environment was clean and light, and factory managements were nice. Workers' representative was not discriminated but had free access to workers and were encouraged to communicate with workers regarding anything about workers' rights and obligations.
Attitude of managers	At the opening meeting, auditor explained the audit scope and the audit standard to the factory representatives. Factory tour, document review, interviews with management members and workers were conducted as scheduled in the audit programs, a full audit was finished under the co-operation of the factory representatives. At the end of the audit, auditor had a closing meeting with factory representatives and all findings were discussed. Factory management signed the CAP and was given a copy.

## Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0

## Workers interviewed by type

Seasonal workers	0
Other workers	0
<b>Total number of workers interviewed</b>	<b>10</b>

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	2	3	-	5

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	4	6	-	10
International migrant workers interviewed	0	0	-	0
<b>Total migrant workers interviewed</b>	<b>4</b>	<b>6</b>	<b>-</b>	<b>10</b>

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	4.0%	5.0%	-	9.0%
Last full calendar year (2024)	3.0%	4.0%	-	7.0%
Previous full calendar year (2023)	7.0%	10.0%	-	17.0%

\* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Number of days lost through job absence in the year, calculated as (the 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\*100

Are accidents recorded?

Yes

Accident records were provided for review, and no accident happened in the past two years.

## Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total

### Annual number of work related accidents and injuries (per 100 workers)\*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

### Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

### Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

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**Percentage of workers that work on average more than 60 total hours in a given week**

<b>Last full calendar year (2024)</b>	0.0%	0.0%	-	0.0%
<b>Previous full calendar year (2023)</b>	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p><b>Current systems:</b>            The facility provided full access to factory tour, document review and interview. The facility did not offer bribes to or threaten the auditors, nor in any way induced the auditors to be dishonest. The facility completed the SAQ before the audit, and there was no any conflicting information SAQ/Pre-Audit Info to Audit findings. The factory appointed a management representative for management of ETI compliance. The facility provided the ETI code to its supplier and requested them to post in their workshops. The facility published a human rights statement on their intranet and formal training was given to employees on the need to protect human rights. The terms and conditions for employees were stated in the employee handbook. The grievance procedure was trained to workers. Responsibility for meeting the legal and client code requirements was shared between management. No inconsistency was found while reviewing production records such as inspection records. The factory did not use contractors or agencies or temporary workers.</p> <p><b>Evidence examined:</b>            The relevant policy and procedures about employees' universal rights. Internal grievance procedure and relevant handling documentation. Training records. Worker and management interview. Factory tour.</p>		

## 0. Enabling accurate assessment

### Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

# 1. Employment is freely chosen

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The audit factory developed and maintained the related policies to ensure Employment is Freely Chosen met all Workplace Requirements in this code area. The Policy makes reference to the Hiring Procedure, which outlines the key mechanisms for all types of employees who could be hired fairly, and all types of employees could choose their work freely in all sections. The procedures outlined processes and responsibilities, including fair principles, anti-discrimination principles, etc.</p> <p>The Manager was assigned to be responsible for implementing procedures. Factory had assigned a person to monitor the effectiveness of procedures to meet policy and Workplace Requirements. There is a clear procedure for updating documentation according to changing requirements or situations.</p> <p>Training in the factory was governed by a training procedure which was the specific responsibility of the EHS Manager. Training on employment is freely chosen was mandatory for all employees. And the training courses had associated assessment to ensure that employees understood the content. Employees were provided with training annually and relevant training records were kept. And all interviewees had the general awareness of the related policies and procedures.</p> <p>Responsibilities for monitoring implementation of employment fairness were defined by the Hiring Procedures. The procedure required that the related person conduct the periodic inspections. The factory conducted the internal audit and management review every year. Factory had assigned a person to monitor the effectiveness of procedures to meet policy and Workplace Requirements. Any misapplication of procedures, or other related deficiencies were identified, the factory management team would immediately look for the solution and identify the proper deadline.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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**Systems and evidence examined to validate this code section**

**Current systems:**

- A policy which prohibited forced labour was available for review.
- A non-formalised application states that workers must present their ID's for proof of age but that only copies must be kept in the personnel files and the original would be given back to the workers.
- The employee handbook – given to new joiner's states that:
  1. Workers can leave with 3 days' notice with no penalty when in probation period but once permanent (this is out of probation) they must give one month written notice.
  2. They will be given their full wages of last month on their last day of work.
  3. The workers are free to leave the workplace outside of their working hours.
- According to interview with workers and management, overtime was voluntary and workers could choose work overtime or not independently.

**Evidence examined:**

Document review (Policy documents, factory rules, employee handbook, etc.)

Worker and management interviews

Workers' contracts and personnel files

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## 1. Employment is freely chosen

### Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

## 1.A. Responsible recruitment and entitlement to work

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory had written a Business Code of Conduct covering respect for human rights, intellectual property, occupational health and safety, environmental, anti-corruption, and prevention and suppression of money laundering and this policy can be adapted to the development of future.</p> <p>2) Resource            Grade: Robust            The TQA Director was assigned to be responsible for implementation.</p> <p>3) Communication &amp; Training:            Grade: Robust            Related training was provided for employees and management and the training results were recorded to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Per documents review and interview, the procedures were used in the recruitment process and daily work. Daily supervision was conducted.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
		No findings	

**Systems and evidence examined to validate this code section**

**Current systems:**

Recruitment policy was established in the factory and office manager was responsible for this item of the code. Per document review, factory management representation and worker interview, all workers in the factory were Chinese. All workers had the proper legal rights to work in this region. The youngest age was 19 years old. All of them were recruited directly by the factory and no agency was involved in factory's recruitment processes. No agency staff or foreign worker was used by the factory.

**Evidence examined:**

Hiring procedure  
Personnel files and labor contracts  
Worker handbook  
Management and worker interview

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	93%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Yunnan, Guizhou, Henan

## Recruitment fees

**Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?** Not Applicable

**Were recruitment fees or costs identified during worker interviews?** No

No recruitment fees or costs was paid by all the employees in the factory.

## 2. Freedom of association and right to collective bargaining are respected

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The facility had established formal policy to employees' right of forming, joining and organizing trade unions upon their choice and to bargain collectively with the facility and this policy can be adapted to the development of future. The facility did not interfere with the establishment, functioning or administration of worker organization or collective bargaining.</p> <p>2) Resource            Grade: Robust            There was no collective bargaining agreement in the facility, workers' representatives were freely elected by all employees including the production workers fairly and publicly. The TQA Director was assigned to be responsible for this section.</p> <p>3) Communication &amp; Training:            Grade: Robust            The facility had conducted abundant training including the topic of Freedom of Association and the Right to Collective Bargaining for all employees. And many kinds of communication channels for workers to raise concerns are established in the facility.</p> <p>4) Monitoring:            Grade: Robust            The facility conducted regular meetings with worker representatives to discuss daily affairs, and the meeting records were provided for review.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
		No findings	

**Systems and evidence examined to validate this code section**

**Current systems:**

- There were evidences of worker's committee at the site.
- The worker representatives were chosen by fellow workers.
- Worker interview confirmed that the members of the committee had been elected by fellow workers, they understood the roles and responsibilities of worker representatives fully, they felt free to communicate with the worker representatives and thought they were equal to each other. No discrimination for the worker representatives was noted.

**Evidence examined:**

- Minutes of the committee meeting
- Site policy on freedom of association
- Interview with workers
- Interview with worker representative
- Interview with manager

## 2. Freedom of association and right to collective bargaining are respected

### Data points

Are trade unions allowed by law in the national context? Yes

Are there any registered trade unions in the workplace? No

Are they active?

Does the employer recognise the trade union? Not Applicable

Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? Yes

Are the worker representatives freely elected by the workforce as a whole? Yes

Does union/worker committee membership reflect the gender composition of the workforce? Yes

Does the membership reflect the nationality composition of the workforce? Yes

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? No

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory had established a policy and procedure on health and safety and this policy can be adapted to the development of future.</p> <p>2) Resource            Grade: Robust            The factory appointed the Admin Manager to take charge of the health and safety. EHS committee was established in the factory.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided pre-work health and safety training to new employees, and provided periodical health and safety training to both existing workers and management such as medical emergency treatment, fire safety training, machine operation training and etc. The factory also recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Some Improvements Recommended            Internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit. However, the requirements of this section were not effectively implemented, as NC was raised due to oversights or gaps in the monitoring systems.</p>

#### Summary of findings

Code area	Workplace requirement	Local law	Finding

<b>3. Working conditions are safe and hygienic</b>	3.A Ensure a safe working environment. Put in...	§1	NC	<a href="#">ZAF600905924</a>
	3.R Provide clean and secure toilets, wash ar...	§2	NC	<a href="#">ZAF600905925</a>
	3.N Maintain a log of all hazardous substance...	§3	NC	<a href="#">ZAF600905926</a>
	3.H Where identified as necessary to reduce r...	§4	NC	<a href="#">ZAF600905927</a>
	3.M Ensure all machinery is installed, mainta...	§5	NC	<a href="#">ZAF600905928</a>
<b>Systems and evidence examined to validate this code section</b>	<p>Current systems:</p> <p>1. General Health and Safety management</p> <ul style="list-style-type: none"> <li>- Mr. Qiu Manager was the Health &amp; Safety Manager for the site.</li> <li>- Potable water was freely available in all areas.</li> <li>- Sufficient clean toilets segregated by gender were available at all times to workers.</li> <li>- Ventilation, temperature and lighting were adequate for the production processes.</li> <li>- Minutes of meetings showed regular meetings between the H&amp;S committee (workers) and the H&amp;S manager, each point was acted on.</li> </ul> <p>2. Fire Safety</p> <ul style="list-style-type: none"> <li>- There were sufficient exits from each work area according to local law and these were clearly marked.</li> <li>- Evacuation diagrams were posted in all areas.</li> <li>- Fire drills were organized and recorded every 6 months of production units. And the latest fire drills were conducted on May 21, 2024 and Nov 11, 2024.</li> </ul> <p>3. Electrical safety</p> <ul style="list-style-type: none"> <li>- There was a competent electrician at the site and his training certificate was available for review.</li> </ul> <p>4. Chemical safety</p> <ul style="list-style-type: none"> <li>- Workers handling chemicals confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.</li> </ul> <p>5. Medical services</p> <ul style="list-style-type: none"> <li>- There were first aid kits in each production areas and they were well stocked.</li> <li>- There were 2 first aiders and the employees had been trained at a local hospital. The first aiders were identified by 'red cross' armband.</li> </ul> <p>Evidence examined:</p> <ul style="list-style-type: none"> <li>- Health and safety policy</li> <li>- Health and safety manual</li> <li>- Health and safety committee minutes</li> <li>- Training records and certificates</li> <li>- Fire equipment maintenance records</li> <li>- Fire drill records</li> <li>- Government licenses</li> <li>- Trained first aider register</li> <li>- Accident reports</li> <li>- Chemical list and MSDS for each chemical</li> <li>- Potable water testing certificates</li> <li>- Interviews with H&amp;S manager</li> <li>- Interviews with workers and H&amp;S committee members</li> </ul>			

# Findings: non-compliances

ZAF600905924

Non-compliance

Due 2025-05-30

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

## Time given to resolve

30 days

## Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

## Verification method

Desktop audit

## Description

审核员发现厂方没有为在车间接触有毒有害物质如：粉尘，噪音和化学品的员工提供职业病体检。It was noted that the factory did not provided the occupational health checks to employees in workshops who were in contact with hazardous materials such as noise, dust and chemicals yearly.

## Area of non-compliance/non-conformance

Local law

Base code

## Corrective and preventative actions

建议工厂给员工提供定期的职业病体检。It is recommended that management adopt practices and controls to ensure that the regular occupational health checks should provide to employees yearly.

## Local law reference

根据《中华人民共和国职业病防治法》第35条：根据《中华人民共和国职业病防治法》第35条：从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。职业健康检查费用由用人单位承担。用人单位不得安排未经上岗前职业健康检查的劳动者从事接触职业病危害的作业；不得安排有职业禁忌的劳动者从事其所禁忌的作业；对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者，应当调离原工作岗位，并妥善安置；对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。职业健康检查应当由取得《医疗机构执业许可证》的医疗卫生机构承担。卫生行政部门应当加强对职业健康检查工作的规范管理，具体管理办法由国务院卫生行政部门制定。Legal Requirement: In accordance with Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases, for the laborers that are engaged in the operations contacting the harm of occupational diseases, the employing work unit shall organize the occupational health examination of the laborers before they take the posts, when they are at the posts and when they leave the posts, the employing work unit shall inform the laborers of the examination results. The employing work unit shall afford the expenses needed for the occupational health examination. The employing work unit may not assign the laborers that haven't gone through the pre-post occupational health examination to undertake the operations involving the harm of occupational diseases; may not assign the laborers that have occupational contraindications to undertake the operations that they shall avoid; the laborers that are found to have the health injuries related to their posts during the occupational health examination shall be transferred from their former posts and be settled appropriately; and the employing work unit may not cancel or terminate the labor contacts signed with the laborers that haven't gone through the occupational health examination before they leave their posts.

\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600905925

Non-compliance

Due 2025-06-29

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

**Time given to resolve**

60 days

**Issue title**

327 - Storage of goods not in line with legal requirements (e.g. too high)

**Verification method**

Desktop audit

**Description**

It was noted that the gap between partial stacks and walls in the warehouse was 0 meter, which was less than the legal requirement of 0.5 meter. 审核员发现仓库部分库存物品垛与墙的间距为0米，小于法定0.5米的要求

**Area of non-compliance/non-conformance**

 Local law  
 Base code

**Corrective and preventative actions**

建议工厂确保成品仓库库存物品垛与墙的间距符合法律要求。It is recommended that management adopt practices and controls to ensure that the width of gap between stacks and walls are in accordance with the legal requirement.

**Local law reference**

根据《仓库防火安全管理规则》第18条：库存物品应当分类、分类储存，每垛占地面积不宜大于100平方米，垛与垛间距不小于1米，垛与墙间距不小于0.5米，垛与梁、柱的间距不小于0.3米，主要通道的宽度不小于2米。 Legal Requirement: In accordance with Article 18 of Rules for Storage Fire Prevention Safety Management: The goods in storage should be classified for storage. The area occupied by any single stack shall preferably not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.

**Evidence**

[No gap between wall.JPG](#)


\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600905926

Non-compliance

Due 2025-05-30

**Code area**

3 Working conditions are safe and hygienic

**Status**

Open\*

**Workplace requirement**

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

**Time given to resolve**

30 days

**Issue title**

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbunded)

**Verification method**

Desktop audit

**Description**

It was noted that there was no anti-leakage facility (e.g. secondary container) for 5 barrels of gluing used in the moulding workshop. 审核员发现工厂没有为成型车间使用的5桶胶水设置防渗漏设施/二次容器。

**Area of non-compliance/non-conformance**

Local law

Base code

**Corrective and preventative actions**

It is recommended that management adopt practices and controls to ensure that the anti-leakage facility (e.g. secondary container) is used for chemicals. 建议工厂为所有的化学品设置防渗漏设施/二次容器。

**Local law reference**

In accordance with article 20 of Regulation for Safety of Hazardous Chemical, an entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, firefighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightening-proof, static-proof, antiseptic, and anti-leakage safety facilities or equipment, such as protection dams and segregated operations, etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof. 根据《危险化学品安全管理条例》第20条 生产、储存危险化学品的单位，应当根据其生产、储存的危险化学品的种类和危险特性，在作业场所设置相应的监测、监控、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备，并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养，保证安全设施、设备的正常使用。

**Evidence**


[No secondary container.JPG](#) 

\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600905927

Non-compliance

Due 2025-05-30

<b>Code area</b>	<b>Status</b>
3 Working conditions are safe and hygienic	Open*
<b>Workplace requirement</b>	<b>Time given to resolve</b>
3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).	30 days
<b>Issue title</b>	<b>Verification method</b>
278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Desktop audit
<b>Description</b>	<b>Area of non-compliance/non-conformance</b>
审核员发现成型车间2名员工在刷胶时没有正确佩戴工厂发放的橡胶手套（只戴了一只）。It was noted that 2 employees in moulding workshop who handling gluing were not wearing rubber gloves correctly(only wore one hand) which provided by factory during the work	Local law Base code

#### Corrective and preventative actions

建议工厂为相关的员工提供必要的个人防护用品，并确保他们正确佩戴。It is recommended that management adopt practices and controls to ensure that necessary personal protective equipments are provided to relevant employees and measures are taken to ensure that employees use such personal protective equipment appropriately.

#### Local law reference

根据《中华人民共和国安全生产法》第45条：生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。Legal Requirement: In accordance with Article 45 of Law of the People's Republic of China on Production Safety, business entities must provide their employees with labor protection products meeting the national or industry standards, and supervise and educate their employees on wearing or using such products in accordance with the rules of use.

#### Evidence



Rubber gloves wore incorrectly.JPG



\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF600905928

Non-compliance

Due 2025-05-30

#### Code area

3 Working conditions are safe and hygienic

#### Status

Open\*

**Workplace requirement**

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

**Time given to resolve**

30 days

**Issue title**

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

**Verification method**

Desktop audit

**Description**

It was noted that 7 out of 60 sewing machines in sewing workshop did not fix needle guard. 审核员发现缝制车间7/60台缝纫机没有安装针挡。

**Area of non-compliance/non-conformance**

Local law

Base code

**Corrective and preventative actions**

It is recommended that management adopt practices and controls to ensure that all sewing machines are equipped with needle guards. 建议工厂为所有的缝纫机安装针挡。

**Local law reference**

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices. 根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。

**Evidence**


[No needle guard fixed.JPG](#) 

\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable  No added floor was noted
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            Child labor forbidden and remedial policies were established in the factory and this policy could be adapted to the development of future.</p> <p>2) Resource            Grade: Robust            The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            ID card was checked during hiring processes and internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
		No findings	

**Systems and evidence examined to validate this code section**

**Current systems:**

- The factory had policy that no worker under the age of 16 years old would be employed.
- The factory had policy that the juvenile workers (if employed) could not work in hazardous position or work at night.
- The factory had procedure to check age of workers at application including checking ID's.
- After joining, original ID's were returned and only copies were kept on file.
- Youngest worker was 19 years old.

**Evidence examined:**

- Hiring policy
- Personnel files of all workers
- Latest list of employees
- Interview with management and workers

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger 3%

Enter the legal age of employment 16

Enter the age of the youngest worker identified 19

Enter the number of workers under local legal minimum age 0

Enter the number of workers under 15 years old 0

Percentage of workers that are apprentices, trainees or interns 0.0%

Were there children present on the work floor but not working at the time of audit? No

Do children live at the accommodation provided to workers? Not Applicable

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            Wage and benefits policies and procedures based on the legal requirements were established in the factory. Clear and sufficient information was available in the policies and procedures.</p> <p>2) Resource            Grade: Robust            The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Fundamental Improvements Required            Internal audit was conducted in the factory as self-monitoring. Wage issue was an important part of the internal audit. Through the cross-check between the onsite production records and the provided wage records, there were no inconsistencies found.            However, the requirements of this section were not effectively implemented, as systemic NC was raised.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600905922</a>

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**Systems and evidence examined to validate this code section**

**Current System**

- The local legal minimum wage was RMB 2010 per month or 11.55 per hour effective from Jan 1, 2024.
- All workers' wages were calculated at hourly rate. All sampled workers were paid at least RMB 16.1 per hour in regular working time according to the wage records.
- The financial office was well organised; there was a good controlled set of processes which were understood by all employees.
- All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time when they were paid.
- Benefits of paid, annual leave were given to all workers and child-bearing was given to appropriate workers.
- All workers were paid on or before 30th of each month by bank and each worker was given a pay slip and signed for their wages.
- Wages have been recorded according to documents checked.

**Evidence examined**

- Worker interview
- Wages and benefits policy
- Local legal minimum wage documents
- Payroll records from Mar 2024 to Feb 2025
- Leave records
- Labour contracts
- Resignation records
- Social insurance records

# Findings: non-compliances

ZAF600905922

Non-compliance

Due 2025-06-29

## Code area

5 Legal wages are paid

## Status

Open\*

## Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

## Time given to resolve

60 days

## Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

## Verification method

Follow up audit

## Description

It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt provided by factory management, it was noted that only 38 out of 92 employees were provided with unemployment, pension, medical, maternity and accident insurance in Mar 2025. 审核员发现工厂的社会保险覆盖不足。根据厂方提供的2025年3月社会保险缴费单据显示工厂仅为38/92名员工提供了失业、养老、医疗、生育和工伤保险。

## Area of non-compliance/non-conformance

Local law

Base code

## Corrective and preventative actions

建议工厂为员工提供所有法定的社会保险福利。It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements.

## Local law reference

根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：(一)退休；(二)患病、负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。Legal Requirement: In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity. The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers are entitled to, must be timely paid in full amount.

## Evidence



[Social insurance.JPG](#)



\* PDF generated at 07:49 (UTC) on 30 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage Wages are based on job skills and experience
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

### Worker renumeration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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### Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	Non applicable

<b>Maximum legal overtime hours</b>	<b>Max hours per day</b>	3.0
	<b>Max hours per week</b>	Non applicable
	<b>Max hours per month</b>	36.0
<b>Actual overtime hours</b>	<b>Max hours per day</b>	2.0
	<b>Max hours per week</b>	14.0
	<b>Max hours per month</b>	46.0
<b>Minimum legal wage</b>	<b>Min per hour</b>	11.55
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	2010.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	16.1
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	2800.0
<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	Non applicable
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable
<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	24.15
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

<b>Number of workers' records checked</b>	30
<b>Provide the date and details of the records</b>	10 samples from Jul 2024 10 samples from Oct 2024 10 samples from current payment month Feb 2025

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**Are there different legal minimum/ legally recognised CBAs wage grades?** No

**For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?**

Above legal minimum

**Indicate the breakdown of workforce per earnings** All workers of workforce earning over minimum wage, at least RMB 16.1 per hour

**Are there any bonus schemes used?** No

**Were accurate records shown at the first request?** Yes

**Were any inconsistencies found?** No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p><b>Current System</b></p> <ul style="list-style-type: none"> <li>- The local legal minimum wage was RMB 2010 per month or 11.55 per hour effective from Jan 1, 2024.</li> <li>- All workers' wages were calculated at hourly rate. All sampled workers were paid at least RMB 16.1 per hour for regular working time according to the wage records. Overtime wages were calculated by 150%, 200% of the wages when overtime arranged on working days and rest days.</li> <li>-The breakdown of the wage of all the employees in factory included regular wage, overtime wage, holiday wage, position allowance, full time allowance, etc</li> <li>-The living wage consideration in the factory met ILO's Principles for living wage estimation. All necessary elements were included. And there is an annual review mechanism.</li> </ul> <p><b>Evidence examined</b></p> <ul style="list-style-type: none"> <li>- Worker interview</li> <li>- Wages and benefits policy</li> <li>- Local legal minimum wage documents</li> <li>- Payroll records from Mar 2024 to Feb 2025</li> <li>- Leave records</li> <li>- Labour contracts</li> <li>- Resignation records</li> <li>- Attendance records</li> <li>- Living wage report.</li> </ul>		

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	<p>1) Policies &amp; Procedures: Grade: Robust Working hour policies and procedures based on the legal requirements were established in the factory. Clear and sufficient information was available in the policies and procedure.</p> <p>2) Resource Grade: Robust The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training: Grade: Robust The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring: Grade: Fundamental Improvements Required Internal audit was conducted in the factory as self-monitoring. Working hour issue was an important part of the internal audit. Through the cross-check between the onsite production records and the provided working hour records, there were no inconsistencies found. However, the requirements of this section were not effectively implemented, as systemic NC was raised.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC <a href="#">ZAF600905923</a>

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**Systems and evidence examined to validate this code section**

**Current System**

- Through employees' interview, overtime is voluntary.
- The factory provided working hour records from Mar 2024 to Feb 2025.
- The facility adopted biometrical attendance recording system to record employees' working hours.
- Based on the 30 sampled employees' attendance records provided by factory, it was noted that the maximum of overtime hours were 2 hours a regular day, 8 hours a rest day and 46 hours a month. The maximum working hours were 54 hours per week. The longest consecutive working day were 6 days.

**Evidence examined**

- Employee interview
- Management interview
- Local and national laws
- Factory policy on working hours
- Time cards
- Computerized time logging system
- Sample pay slips with recorded hours all workers interviewed
- Workers contracts
- Quality and production records to cross check hours

# Findings: non-compliances

ZAF600905923

Non-compliance

Due 2025-06-29

## Code area

6 Working hours are not excessive

## Status

Open\*

## Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

## Time given to resolve

60 days

## 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)

## Verification method

Follow up audit

## Description

Base on local requirement, it was noted that 30 out of 30 sample population employees worked in excess of the statutory overtime hour limits. A review of 30 sample population employees' time records (10 samples from Jul 2024, 10 samples from Oct 2024, 10 samples from current paid month Feb 2025) yielded the following: - 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 46 hours) in Jul 2024, - 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 46 hours) in Oct 2024, - 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 46 hours) in Feb 2025, which was not in compliance with the legal requirement. 根据法律要求, 从厂方提供的工时记录, 审核员发现员工加班时间超出了法定标准。审核员从厂方提供的工时记录中共抽取30个样本(其中从2024年7月抽取10个, 从2024年10月抽取10个, 从最近月份2025年2月抽取10个), 发现共有30名员工加班时间超出了法定标准, 具体为: -10/10名员工在2024年7月的加班时间为46小时, -10/10名员工在2024年10月的加班时间为46小时, -10/10名员工在2025年2月的加班时间为46小时, 超过每月加班时间不能超过36小时的法律规定。

## Area of non-compliance/non-conformance

Local law

Base code

## Corrective and preventative actions

建议工厂确保员工的加班时间符合法律要求。 Recommended Corrective Action: It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits.

## Local law reference

根据《中华人民共和国劳动法》第41条: 用人单位由于生产经营需要, 经与工会和劳动者协商后可以延长工作时间, 一般每日不得超过一小时; 因特殊原因需要延长工作时间的, 在保障劳动者身体健康条件下延长工作时间每日不得超过三小时, 但是每月不得超过三十六小时。 Legal Requirement: In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed.

## Evidence

## Attendance.jpg



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## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	No less than 125% overtime premium was noted. Normal overtime premium was 150%, weekend overtime premium was 200%
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	54.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory established policy on anti-discrimination per local law's requirement. The policy indicated that all workers had equal right on wage and benefits, overtime, promotion, and resignation, the factory would not ask unreasonable requirement during recruiting process, female workers would not be discriminated no matter they were married or not, they would be paid the same as male workers in the same position.</p> <p>2) Resource            Grade: Robust            The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit. According to workers' interview, document review and onsite observation, no discrimination case was observed.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
		No findings	

## Systems and evidence examined to validate this code section

### Current systems:

- No worker was required to do the examination of the hepatitis B virus and HIV.
- Anti-discrimination procedure on hiring, compensation, promotion and access to training was available during the audit.
- Gender divisions did not exist in the factory; both female and male workers were distributed in all types of work.
- There was an internal grievance process; all of the interviewees were aware of the grievance channels in case they encountered any discrimination cases.
- There was no evidence of sexual harassment.

### Evidence examined:

- The hiring and termination procedure, leave application records and employee handbook.
- Payrolls
- Attendance records
- Termination records
- Training records

## 7. No discrimination is practiced

### Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	Chinese

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The policy and procedure on regular employment were in place. The hiring procedures indicated the employees' legal rights such as wages and benefits, working hours, occupational health and safety etc.</p> <p>2) Resource            Grade: Robust            The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit. The factory signed labor contracts or retirement reemployment agreements with all workers and also provided one copy to all workers.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

**Systems and evidence examined to validate this code section**

**Current systems:**

All workers (local and migrant) were permanent workers and were recruited by the factory directly.  
The site had proper systems in place to manage the temporary workers in compliance with the code of local labour law.  
All workers had received signed labour contracts.

**Evidence examined:**

The hiring and termination practises  
Personal files  
Payroll records were provided for review.  
Contracts

## 8. Regular employment is provided

### Data points

Percentage of workers that are permanently or temporarily employed 100.0%

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment 0.0%

Percentage of workers employed as apprentices, trainees or interns 0.0%

## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory had established homeworker and subcontractor management policies and the policies could be adapted to the development of future.</p> <p>2) Resource            Grade: Robust            The TQA Director was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development. Factory management knew the definition of subcontractor and homeworker.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Internal audit and audits for suppliers were conducted to monitor the implementation of procedures annually and hold management review with auditee factories after audits to ensure the effectiveness of audits. Per onsite observation and documents review, all processes and final products were finished in the factory. No subcontractor or homeworker was used by the factory.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to validate this code section**

**Current systems:**

- The factory had policies on homeworking and sub-contracting control.
- No homeworking was used by factory.
- No process was subcontracted outside

**Evidence examined:**

Document Review (homeworking and sub-contracting control policy, factory regulations, product in and out records)

Factory Tour

Management and worker interviews

ID Check and the factory provided the social responsibility internal audit record of the outgoing factory.

## 8.A. Sub-contracting and homeworkers are used responsibly

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
No home worker and supply chains used

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
No subcontractor was used.

Are any sub-contractors used? No

## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>The audit factory developed and maintained the related policies to ensure No Harsh or Inhumane treatment allowed met all Workplace Requirements in this code area. The Policy makes reference to the Anti-abuse and Anti-harassment Procedures, which outlines the key mechanisms of the anti-abuse and anti-harassment practices identification. The related practices were prohibited, and the related disciplinary measures were determined, which was compliance with the legal requirements. The Manager was assigned to be responsible for implementing procedures. Factory had assigned a person to monitor the effectiveness of procedures to meet policy and Workplace Requirements. There is a clear procedure for updating documentation according to changing requirements or situations.</p> <p>Training in the factory was governed by a training procedure which was the specific responsibility of the EHS Manager. Training on Anti-abuse and Anti-harassment was mandatory for all employees. And the training courses had associated assessment to ensure that employees understand the content. Employees were provided with training annually and relevant training records were kept. And all interviewees had the general awareness of the related policies and procedures.</p> <p>Responsibilities for monitoring the implementation of Anti-abuse and Anti-harassment were defined by the Anti-abuse and Anti-harassment Procedures. The procedure required that the related person conducts the periodic inspection. The factory conducted the internal audit and management review every year. Factory had assigned a person to monitor the effectiveness of procedures to meet policy and Workplace Requirements. Any misapplication of procedures, or other related deficiencies were identified, the factory management team would immediately look for the solution and identify the proper deadline.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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**Systems and evidence examined to validate this code section**

**Current systems:**

- As per document review, management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination. The site had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- As per management interview, document review and workers interview, there was a policy on Harsh and Inhumane Treatment.
- There was an internal process for grievance which is the suggestion box, where workers can report any grievances (harassment, bullying, discrimination etc.); any received complaint will be handled by management without any reprisal for the worker in question.

**Evidence examined:**

The relevant policy on disciplinary, prevention of harassment and abuse  
Internal grievance procedure documentation.

Training records

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## 9. No harsh or inhumane treatment is allowed

### Data points

<b>Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?</b>	Yes, there is a formal grievance process The grievance process is available to all workers
<b>What type of grievance mechanism(s) are available?</b>	Hotline was used for employees to report violation to labor bureau. Suggestion box was provided to employees to raise concern to management within the factory.
<b>Number of grievances raised in the last 12 months</b>	0
<b>Number of grievances resolved in the last 12 months</b>	0

## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory had established the environment management procedure and provided the significant environmental impact list of the site and its processes. The policy and procedure on emergency processing procedures including emergency accident processing procedure were also in place.</p> <p>2) Resource            Grade: Robust            The Admin Manager was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

**Systems and evidence examined to validate this code section**

**Current systems:**

- The wastes were disposed appropriately.
- The factory management was aware of the environmental standards/code requirements and had a system in place to monitor their performance against these.
- The factory established the environment policy and procedures, which were communicated with their suppliers.
- The factory worked out the report form of environmental impacts of the construction of the facility, the approval document, and the inspection and acceptance report of completed environmental protection facilities.

**Evidence examined:**

Document and policy review (Environment policy, environmental documents, etc.)  
Management interview

## 10.A. Environment 2-Pillar

### Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No environmental or energy management certificates provided
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	<p>Yes</p> <p>The factory had a continuous improvement plan for reducing environmental aspects. The factory had an annual reduction target for natural resources use and discharge.</p>

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p><b>Current systems:</b></p> <ul style="list-style-type: none"> <li>- The annual monitoring report for waste air, wastewater and boundary noise showed the pollutant discharging was compliance with environmental law.</li> <li>- The factory management was aware of the environmental standards/code requirements and had a system in place to monitor their performance against these.</li> <li>- The factory established the environment policy and procedures, which were communicated with their suppliers.</li> <li>- The factory had the continuous improvement plan for improve their environmental performance. The factory recorded and reviewed the use and discharge of natural resources.</li> </ul> <p><b>Evidence examined:</b></p> <ul style="list-style-type: none"> <li>- Environmental policy</li> <li>- The legal environmental permits</li> <li>- Annual monitoring report for waste air, noise and water</li> <li>- Training records on environment</li> <li>- Waste disposed records</li> <li>- Records of the use and discharge of natural resources</li> </ul>		

## 10.B. Environment 4-Pillar

### Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Packaging optimization Sustainable material sourcing Responsible use and management of water Circular economy and resource efficiency Biodiversity and eco system impact management
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes  The factory established environment policy and procedures, which were in compliance with clients' requirements and local legal requirements. And the policy and procedures were implemented during daily work.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes  Water and energy consumption: the site has set the reduction target by 5% per production unit in the following 3 years.
Has the site 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  The factory had established the environment policy and procedures, which was communicated with their suppliers. And the factory had checked the appropriate permits and licenses of all business partners.

### Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	350,332	302,971
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	Data not available	Data not available

Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
<b>Water sources</b>	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	2,030	1,865
<b>Water discharged</b>	City pipe network	City pipe network
Water volume discharged (m3)	1,832	1,622
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	12	11
Total hazardous waste produced (mt)	0.5	0.2
Waste to recycling (mt)	12	11
Waste to landfill (mt)	Data not available	Data not available
Waste to other (mt)	Data not available	Data not available
Total product produced (mt)	320,000	300,000

## 10.C. Business ethics

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>1) Policies &amp; Procedures:            Grade: Robust            The factory established the documented Business Ethics policy concerning bribery, corruption, or unethical Business Practice, which was clearly communicated to all relevant parties, including their suppliers. And this policy could be adapted to the development of future.</p> <p>2) Resource            Grade: Robust            The Office Manager was designated to be responsible for implementation and the management structure in the factory could be adapted to each stage of the factory's development.</p> <p>3) Communication &amp; Training:            Grade: Robust            The factory provided related training to both employees and management annually, and recorded the training results to ensure that employees can understand the training content after each training.</p> <p>4) Monitoring:            Grade: Robust            Internal audit was conducted to monitor the implementation of procedures annually and hold management review after internal audit to ensure the effectiveness of audit.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

**Systems and evidence examined to validate this code section**

**Current systems:**

- Factory's management knew the applicable laws, their end client's Business Ethics standards/code requirements. A system was in place to monitor their performance against the integrity issues.
- The factory established the documented Business Ethics policy concerning bribery, corruption, or unethical Business Practice, which was clearly communicated to all relevant parties, including their suppliers.
- If ethical issues were found, they would be investigated and resolved.
- Relevant training was provided to employees, whose job roles carried a higher level of risk in the area of ethical Business Practice.

**Evidence examined:**

- Policy and procedures on business ethics
- Training records on business ethics
- Handling records for raised ethical issues
- Management and employee Interview

## 10.C. Business ethics

### Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

No certified anti-bribery Management Systems onsite.

## Attachments



[Time recording machine.JPG](#)



[Toilet.JPG](#)



[Warehouse.JPG](#)



[Sewing workshop.JPG](#)



[First aid kit.JPG](#)



[Gluing workshop.JPG](#)



[Fire hydrant.JPG](#)



[Moulding workshop.JPG](#)



[Fire alarm.JPG](#)



[Suggestion box.JPG](#)



[Factory name.JPG](#)



[Safety exit sign.JPG](#)



[Fire extinguishers.JPG](#)



[Factory Gate.JPG](#)



[Factory building.JPG](#)



[Factory address.JPG](#)





[emergency light.JPG](#)

[Eye-washing.JPG](#)

[Cutting\\_workshop.JPG](#)

[Drinking water.JPG](#)



[Assembly&packing  
workshop.JPG](#)

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