# Sedex Members Ethical Trade Audit (SMETA) Report

### Version 5.0 Dec 2015, 2/4 Pillar Audit; replaces version 4.0 May 2012

Supplier name:	N/A	
Site country:	China	
Site name:	JianHua Tissue Product Manufactu	rer
Parent Company name (of the site):	N/A	
SMETA Audit Type:	🛛 2–Pillar	4–Pillar
Date of Audit	25 <sup>th</sup> December 2015	

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety, Environment and Business ethics. The SMETA Best Practice Guidance Version 5 December 2015 was applied. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers, and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Management systems and code implementation,
  - Entitlement to Work & Immigration,

Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics

The new ETI Working Hours Clause

• Now integrated into this latest SMETA version.

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







Audit Company Name: Intertek	<b>Report Owner (payee):</b> JianHua Tissue Product Manufacturer
Sedex Company Reference: (only available on Sedex System)	S: Not supplied
Sedex Site Reference: (only available on Sedex System)	P: Not supplied

Audit Conducted By			
Commercial	$\boxtimes$	Purchaser	
NGO		Retailer	
Trade Union		Brand Owner	
Multi-stakeholder		Combined Audit (select all th	nat apply)

### **SMETA Declaration**

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

Any exceptions to this must be recorded here (e.g. different sample size): There are only 20 employees working in the facility and no dormitory or canteen is available for employees, so total audit hours of this facility is little less than 8 hours.

Auditor Name(s) (please list all including all interviewers): None Lead auditor: Robin Wang Team auditor: Nil Interviewers: Robin Wang

Date: 25<sup>th</sup> December 2015



### **Non–Compliance Table**

Issue		Area (Only check bo: and only in the	Record the number of issues by line*:				
	se click on the issue title to go direct to appropriate audit results by clause)	ETI Base Code	Local Law	Additional Elements (i.e. not part of ETI code )	NC	Obs	GE
0	Management systems and code implementation				0	0	0
1	Employment Freely Chosen				0	0	0
2	Freedom of Association				0	0	0
3	Safety and Hygienic Conditions				0	0	0
4	Child Labour				0	0	0
5	Wages and Benefits	$\boxtimes$	$\boxtimes$		1	0	0
6	Working Hours	$\boxtimes$	$\boxtimes$		1	0	0
7	Discrimination				0	0	0
8	Regular Employment				0	0	0
8A	Sub–Contracting and Homeworking				0	0	0
9	Harsh or Inhumane Treatment				0	0	0
10A	Entitlement to Work				0	0	0
10B2	Environment 2–Pillar				0	0	0
10B4	Environment 4–Pillar				N/A	N/A	N/A
10C	Business Ethics					N/A	N/A

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



### **Summary of Findings**

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

#### Audit Process

This periodic audit was conducted by Intertek Testing Services Shenzhen Ltd. One auditor assessed / verified the facility's operations against the ETI Base Code and local legislations on a sampling basis in one day.

Overview of opening meeting, factory management responses

At 09:20, auditor entered into the facility and then held an opening meeting according to the ETI Base Code; the facility management Mr. Welson Ye / facility manager, Ms. Tan Yiwei / accounting supervisor and other two administration staff were present in the meeting. They stated that they would be co-operative with this audit.

Summary of Findings (positive and negative)

In view of the findings raised, non-compliances were found in the areas of Wages and Benefits and Working Hours. For other areas, no violations were noted as following:

- 1. Only 11 out of 20 employees had participated in basic endowment insurance, employment injury insurance, basic medical insurance, unemployment insurance and maternity insurance.
- 2. The monthly overtime hours of 10 out of 10 randomly selected employees ranged from 40 to 56 hours in December 2014 (peak month) and 56 to 58 hours in November 2015 (current month).

Please refer to the details in the individual sections.

#### Best Practices Observed:

The facility had all employees participated in the commercial injury insurance covering the period of 14 May 2015 to 13 May 2016.

Additional Auditor Remark: None



### **Audit Details**

Audit Details				
A: Report #:	GUZ-09351-05			
B: Time in and time out (SMETA Best Practice Guidance and Measurement Criteria recommends 9.00–17.00 hrs. if any different please state why in the SMETA declaration )	Day 1 Time in: 9:20 Day 1 Time out: 17:00	Day 2 Time in: Day 2 Time out:	Day 3 Time in: Day 3 Time out:	
C: Number of Auditor Days Used: (number of auditor x number of days)	one auditor in one day			
D: Audit type:	☐ Full Initial ⊠ Periodic ☐ Full Follow–up ☐ Partial Follow–Up ☐ Partial Other – Defi	ne		
E: Was the audit announced? (AAG recommends a window of three weeks for semi- announced, this gives optimum results)	Announced Semi – announced: Unannounced	Window detail: weel	٨S	
F: Was the Sedex SAQ available for review?	☐ Yes ⊠ No			
If <b>No</b> , why not? ( <i>Examples would be, site has not completed</i> <i>SAQ, site has not been asked to complete the</i> <i>SAQ.</i> )	The facility did not prov	vide SAQ for review.		
G: Any conflicting information SAQ/Pre- Audit Info to Audit findings?	Yes No If <b>Yes</b> , please capture N/A, The facility did no	detail in appropriate aud t provide SAQ during th	lit by clause e on-site audit.	
H: Auditor name(s) and role(s):	Robin Wang			
I: Report written by:	Robin Wang			
J: Report reviewed by:	Jessica Yang			
K: Report issue date:	4 <sup>th</sup> January 2016			
L: Supplier name:	N/A			
M: Site name:	JianHua Tissue Produc	ct Manufacturer		

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N: Site country:	China				
O: Site contact and job title:	Welson Ye / facility manager				
P: Site address: (Please include full address)	No.130, Jiangha	No.130, Jianghai Road, Jiangmen City, Guangdong Province, China			
Site phone:	86-750-3811879	)			
Site fax:	86-750-3811872				
Site e-mail:	info@bobogroup	o.com			
Q: Applicable business and other legally required licence numbers: for example, business license no, and liability insurance		Business license No.: 440700000004019 Valid date: long term			
R: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Tissue				
S: Audit results reviewed with site management?	Yes				
T: Who signed and agreed CAPR (Name and job title)	Welson Ye / facility manager				
U: Did the person who signed the CAPR have authority to implement changes?	Yes				
V: Present at closing meeting (Please state name and position, including any workers/union reps/worker reps):	Mr. Welson Ye / facility manager from the audited facility Ms. Tan Yiwei / accounting supervisor - from the audited facility Ms. Yan Jun / assistant to manager - from the audited facility Ms. Tan Jinai / purchasing supervisor - from the audit facility Robin Wang / leading auditor - from Intertek				
W: What form of worker representation / union is there on site?	□ Union (name) ⊠ Worker Committee □ Other (specify) □ None				
X: Are any workers covered by Collective Bargaining Agreement (CBA)	Yes No N/A. There is no CBA in the facility.				
Y: Previous audit date:	4 <sup>th</sup> September 2014				
Z: Previous audit type:		SMETA 2– pillar	SMETA 4– pillar	Other	
	Full Initial				

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	Periodic		
	Full Follow–Up Audit		
	Partial Follow– Up		
	Partial Other*		
	*If other, please of	define: N/A	



# Audit Scope/Actual Results

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week and month)	Legal maximum: 8 hours per day and 40 hours per week	8 hours per day and 40 hours per week	☐ Yes ☐ No N/A. No Collective Bargaining Agreement in the facility.
B: Legal Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week and month)	Legal maximum: Not exceed 3 hours per day and 36 hours per month	The maximum overtime hours were: 1) 2 hour per day and 58 hours in a month of November 2014 (current and peak season); 2) 2 hours per day and 18 hours in the month of June 2015 (random non- peak season); 3) 2 hours per day and 56 hours in December 2014 (random peak season).	☐ Yes ☐ No N/A. No Collective Bargaining Agreement in the facility.
C: Legal age of employment: (Minimum legal and actual minimum age at site)	Legal minimum: 16	20 years	
D: Legal minimum wage for standard/contracted hours: ( <i>Minimum legal and actual minimum wage at site, please state if possible per hr, day, week and month</i> )	Legal minimum: local minimum wage standard was set at RMB 1130 per month equivalent to RMB6.49 (1130/21.75/8) per hour since 1 May 2014.	RMB1500 per month, equivalent to RMB8.62 per hour	Yes No N/A. No Collective Bargaining Agreement in the facility.
E: Legal minimum overtime wage: (Minimum legal and actual minimum overtime wage at site,	Legal minimum: The employing	The facility paid employees 150%	☐ Yes ☐ No



	r		
please state if possible per hr ,day, week and month)	unit shall, according to the following standards, pay labourers remuneration higher than those for normal working hours under any of the following circumstances: 1) to pay no less than 150%of the normal wages if the extension of working hours is arranged; 2) to pay no less than 200% of the normal wages if the extended hours are arranged on days of rest and no deferred rest can be taken; and 3) to pay no	and 200% of normal rate for their overtime work on weekdays and rest days respectively, which met the legal requirement. And No employee worked on the official holidays.	N/A. No Collective Bargaining Agreement in the facility.
	and no deferred rest can be taken; and		

<b>Audit Scope</b> (Please select the code and additional requirements that were audited against during this audit)		
2–Pillar Audit	$\square$	
10B4: Environment 4–Pillar		



10C: Business Ethics	
All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors.	

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

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

### Audit Overview

Audit Overview						
	Management	t	Worker Representatives			
Audit attendance	Senior management		Worker Committee representatives		Union representatives	
A: Present at the opening meeting?	🛛 Yes	🗌 No	🗌 Yes	🛛 No	🗌 Yes	🛛 No
B: Present at the audit?	🛛 Yes	🗌 No	🗌 Yes	🛛 No	🗌 Yes	🛛 No
C: Present at the closing meeting?	🛛 Yes	🗌 No	🗌 Yes	🛛 No	🗌 Yes	🛛 No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	The worker r	epresenta	tive was busy a	at work on	the audit day.	
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No trade unio	on existed	in the facility			



F: Site description: (Include size, location and age of site. Also include structure and number of buildings)	Road, Jiangm	e Product Manufacturer is locate en City, Guangdong Province, C e existing location since April 2004 03.	hina. The facility has
	employees are 20-47 years warehouse, p	employees including 7 female employees including 7 female employees of currently working in the factory. To old. There are 17 production urchasing staff etc) and 3 non-jurity guards). The proportion of loca 100% to 0%.	The ages ranged from employees (including production employees
	2/F to 4/F of	facilities, the factory consists of one one 6-storey building used as o dormitory, canteen or kitchen is av	office, workshop and
	hour is from 8 Electronic Atte employee sho	s work for 5 days a week in one shi 3:00 to 17:30 with 1.5 hours' break endance System is used for tim ould scan their IC card when the pployees' wages are calculated or	k from 12:00 to 13:30. e keeping and every ey go in and out the
	Production building A	Description	Remark, if any
	Floor 1	Office, Cutting Section and Warehouse	Only 2 employees working in the cutting section on the audit date
	Floor 2	Packing Section	Only 2 employees working in the Packing section on the audit date
	Is this a shared building?	No	Nil
	Production building B	Description	Remark, if any
	Floor 2 of 6- storey building	Cutting and Packing Section	Only 8 employees working in the Packing section on the audit date
	Floor 3 of 6- storey building	Cutting and Packing Section	No employee working here. Facility said this time of this year was in non-peak season, so this line was not at work.



	Floor 4 of 6- storey building	Warehouse	Only 1 employee working in the Packing section on the audit date
	ls this a shared building?	Yes	The 1/F of this building is used by another plastic product manufacturer and 5/F and 6/F of this building are empty. All of these three floors are not in the audit scope.
G: Site function:	<ul> <li>Agent</li> <li>Factory Processing/Manufacturer</li> <li>Finished Product Supplier</li> <li>Grower</li> <li>Homeworker</li> <li>Labour Provider</li> <li>Pack House</li> <li>Primary Producer</li> <li>Service Provider</li> <li>Sub-Contractor</li> </ul>		
H: Month(s) of peak season: <i>(if applicable)</i>	September to May of following year in the past but there is no obvious peak season in this year.		
I: Process overview: (Include products being produced, main operation	s, number of proc	duction lines, main equipment used)	
The main product manufactured by the facility is tissue. The main production processes are listed as follows: Cutting and Packing. The main machine list of the facility is as following: Pucker machine: 18 sets, cut machine:3 sets, packing machine:1 set etc.			
J: Attitude of workers: (Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk			
Total 10 employees were selected for interview. 6 employees (2 males and 4 females) were selected for the individual interview and 4 employees (3 males and 1 female) were interviewed in one group. Through employees' interviews, it was noted that all employees were satisfied with the facility and no negative information was raised.			
K: Attitude of workers committee/union reps: (Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk			ormation should be
One employee representative was busy at work on the audit and she did not participate in the audit, but she was selected for interview only. As per the interview with her, she confirmed that employees were pleasant with the facility working environment and no negative information was raised.			

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L: Attitude of managers:

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

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



### **Key Information**

<b>Key Information</b> (click on the key information title to go to appropriate section of the report)			
A: Do all workers (including migrant workers) have contracts of employment/employment agreements? (Go to clause 8 – Regular Employment)	⊠ Yes □ No		
B: Are maximum standard/contracted working hours clearly defined in contract/employment agreements? (Go to clause 8 – Regular Employment)	⊠ Yes □ No		
C: Were appropriate records available to verify hours of work and wages? (Go to clause 5 – Living Wage)	⊠ Yes □ No		
D: Were any inconsistencies found? (if yes describe nature) (Go to Wages Table)	☐ Yes ⊠ No	<ul> <li>Poor record keeping</li> <li>Isolated incident</li> <li>Repeated occurrence</li> </ul>	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum? (Go to clause 5 – Living Wage)	Wages found:	Please indicate the breakdown of workforce according to earnings:	
	☐ Below legal min ☐ Meet ⊠ Above	<ul> <li>% of workforce earning under min wage</li> <li>% of workforce earning min wage</li> <li>_100_% of workforce earning above min wage</li> </ul>	
F: % of piece rate workers: (if applicable)	0%		
G: Do the standard/contracted hours stated in a contract/employment agreement exceed the law or 48 hours per week? (Go to clause 6 – Working hours)	☐ Yes ⊠ No		
H: If yes, what are the standard/contracted hours per week as stated in the contract/employment agreement? (Go to clause 6 – Working hours)	N/A hrs/week	ApproxN/A	
I: Combined hours (standard/contracted plus overtime = total hours) over 60 per week found? (Go to Working Hours Analysis)	□ Yes ⊠ No		
J: Are workers provided with 1 day off in every 7-day-period, or 2 in 14-day-period (where the law allows)?	☐ Yes ☐ No If 'No', please expl	lain: N/A	

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K: Are the correct legal overtime premiums paid? (Go to Wages Table)	<ul> <li>☑ Yes</li> <li>☑ No</li> <li>☑ N/A – there is no legal requirement to OT premium</li> </ul>
L: Please state what actual OT is paid. (As a percentage of the workers standard rate) (Go to Working Hours Analysis)	<ul> <li>Please give details of overtime premium as a % of standard wages:</li> <li>0%</li> <li>1% - 115%</li> <li>116% - 124%</li> <li>× 125% - 199%</li> <li>× 200%+</li> <li>Please give details:</li> <li>1) 150% of the normal wages if the extension of working hours is arranged;</li> <li>2) 200% of the normal wages if the extended hours are arranged on days of rest and no deferred rest can be taken.</li> </ul>
M: Is there any night production work at the site?	□ Yes ⊠ No
N: % of workers living in site provided accommodation (if applicable):	No dormitory is available.
O: Age of youngest worker found: <u>(Go to clause 4 – Child labour)</u>	20 years old
P: Workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☐ No N/A: No employee under 18 was found.
% of under 18's at this site (of total workers)	0 %
Q: What form of worker representation/union is there on site? (Go to clause 2 – Freedom of Association)	<ul> <li>□ Union (name)</li> <li>⊠ Worker Committee</li> <li>□ Other (specify)</li> <li>□ None</li> </ul>
R: Is it a legal requirement to have a union? (Go to clause 2 – Freedom of Association)	☐ Yes ⊠ No
S: Is It a legal requirement to have a workers committee? (Go to clause 2 – Freedom of Association)	☐ Yes ⊠ No
T: Is there any other form of effective worker/management communication channel? (Other than union/worker committee) (Go to clause 2 – Freedom of Association)	<ul> <li>☑ Yes</li> <li>☑ No</li> <li>Describe: Telephone, suggestion box</li> </ul>
U: Are there any External Processes? (Go to clause 8A – Sub–contracting and Home working)	<ul> <li>Sub–Contracting</li> <li>Homeworking</li> <li>Other External Process</li> </ul>

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⊠ No external processes



### **Management Systems**

	Management Systems:			
A: Nationality of Management	Chinese			
B: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: <u>65</u> % Female <u>35</u> %			
C: Majority nationality of workers	Chinese			
D: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	about 15 %. They wanted to find better jobs.			
E: Were accurate records shown at the first request?	⊠ Yes □ No			
F: If <b>No</b> , why not?	N/A			
G: In the last 12 months, has the site been subject to any fines/prosecutions for non– compliance to any regulations?	☐ Yes ⊠ No Please describe: No any fines/prosecutions.			
H: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	Yes No Please describe: The facility's hiring procedure included that there was no forced, bonded or involuntary prison labour. The written hiring procedures stated that the facility will never employ and use any child labour under the age of 16 years old. Non-discrimination policy showed that no discrimination was available in hiring, compensation, access to training, promotion, termination or retirement. Anti-harsh treatment policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.			
I: If <b>Yes</b> , is there evidence (an indication) of effective implementation? Please give details.	During facility tour and personnel files review, no forced labour or child labour was observed in the facility. During facility management and employees' interview, it was noted that no discrimination, physical abuse or harassment happened in the facility and the disciplinary procedure of the facility was verbal warning and education.			
J: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	Yes No Please describe: The facility provided the training records for review.			
K: If <b>Yes</b> , is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	During the training records review, all managers and employees confirmed that they understood the policy of forbidden principles of the forced labour, child labour, discrimination, harassment and abuse.			



L: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 <sup>rd</sup> party?	☐ Yes ⊠ No Please describe: N/A
M: If <b>Yes</b> , are workers aware of these channels? Please give details.	N/A
N: Have health and safety risks been identified e.g. through internal audits, formal risk analysis process, worker involvement etc.?	<ul> <li>☑ Yes</li> <li>☑ No</li> <li>Please describe: The health and safety risks had been identified through formal risk analysis process.</li> </ul>
O: If <b>Yes</b> , has effective action been taken to reduce or eliminate these risks?	Safety training was given to employees (such as the PPE for dust- proof, fire extinguishers usage, fire-fighting equipment inspection and so on)
P: Are accidents recorded?	Yes No Please describe: During injury log review, there was no accident in the past one year.
Q: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work hours?	Yes No Please describe: Compared capacity with employees' work load, unrecorded work hours were not observed during this audit.
R: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	Yes
S; Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). <i>Please detail (Number and date).</i>	No
T: Is there a Human Resources manager/department? If Yes, please detail.	<ul> <li>☑ Yes</li> <li>☑ No</li> <li>Please describe: There was a Human Resources department with one assistant to manager in the facility.</li> </ul>



### Worker Analysis

Worker Analysis								
		Local		Migrant				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total
Worker numbers – male	13	0	0	0	0	0	0	13
Worker numbers – female	7	0	0	0	0	0	0	7
Total	20	0	0	0	0	0	0	20
	_	_	_	_	_	_	_	
Number of Workers interviewed	10	0	0	0	0	0	0	10

#### **Contractors:**

(Individuals supplying workers to site with the workers paid by contractors, not by site)

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

#### **Migrant Workers:**

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

D: Originating Locations/Countries:	N/A (All employees are locals.)
E: Type of work undertaken by migrant workers :	N/A
F: Were migrant workers recruited through an agency?	☐ Yes ☐ No



If yes, please give details.	N/A Please describe: No migrant employees worked in the facility.
If <b>Yes</b> , is there a contract with the agency? Provide details of agencies and contractual arrangements including any fees lodged during the recruitment process.	N/A
G: Does the site have a system for checking labour standards of agencies? If yes, please give details.	Yes No N/A Please describe: N/A. All employees were directly recruited by the facility.
H: Percentage of migrant workers in company provided accommodation:	0%. No dormitory is available.



### Audit Results by Clause

0: Managements system and Code Implementation (click here to return to NC Table)

0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees.

0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### **Current systems:**

Mr. Welson Ye / Manager was responsible for compliance with the Code. The facility communicated this Code to all employees and to their suppliers by training.

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

1. Social compliance policy was reviewed. It stated complying with ETI Code, written policies and procedure that being provided individually to employees.

2. Company Ethics procedure contained details of Code and Business Ethics and the communication ways.

3. Management interview and employee interview

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



Observation:	
Description of observation: None observed Local law and/or ETI requirement: Not applicable	<b>Objective evidence</b> <b>observed:</b> Not applicable
Comments: Not applicable	
Good Examples observed:	

Good Examples observed:		
Description of Good Example (GE): None observed	<b>Objective evidence observed:</b> Not applicable	



#### 1: Employment is Freely Chosen

(Click here to return to NC-table)

#### ETI

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### **Current systems:**

- 1. The employees were employed on a voluntary basis and free to leave the facility or resigning.
- 2. The facility did not withhold any employees' ID cards.
- 3. The facility did not limit the employees' freedom or lock any exit of the facility during working time.
- 4. The facility did not require any payment for work tools, uniforms, PPE, IC card, training, etc.
- 5. There was no any hint that the facility used prison labour.

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

1. The facility's hiring procedure was reviewed. The procedure included the following clauses: the facility did not require deposit or withhold employees' ID cards; the facility did not limit the employees' freedom; there was no forced, bonded or involuntary prison labour; and employees were free to leave their employer after reasonable notice.

2. Employment contracts contained the notice periods when the employees would like to leave their employer.

- 3. Management interview and employee interview
- 4. Facility tour indicated no sign of employees being forced, bonded or involuntary.

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

Observation:	
Description of observation:	Objective evidence



None observed Local law or ETI requirement: Not applicable	observed: Not applicable
<b>Comments:</b> Not applicable	

Good Examples observed:	
None observed	<b>Objective evidence observed:</b> Not applicable



2: Freedom of Association and Right to Collective Bargaining are Respected (Click here to return to NC-table) (Click here to return to Key Information)

ETI

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities. 2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### **Current systems:**

1: According to facility management interview, they did not interfered in any legal activities which were organized by their employees.

2: Interviewees confirmed there was no union in the facility, and they could send their grievances through employee representative, suggestion box and meeting. Furthermore, they said the issue would be corrected quickly by the facility.

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

1. A policy on freedom of association was reviewed. It stated that employees were free to form trade unions. Nobody will be treated differently whether they are members of the union.

2. Management interview and employee interview

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



Observation:			
<b>Description of observation:</b> None observed			<b>Objective evidence</b> <b>observed:</b> Not applicable
Local law or ETI requirement: Not applicable			
<b>Comments:</b> Not applicable			
A: Name of union and union representative, if applicable:	Not applicable. There wasn't union in the facility.	Is there evidence of free elections? $\Box$ Yes $\Box$ No $\boxtimes$ N/A	
B: If no union what is parallel means of consultation with workers e.g. worker committees?	Telephone, employee representative, suggestion box, meeting and the team leader	Is there evidence of free elections? ⊠ Yes □ No □ N/A	
C: Were worker representatives/union representatives interviewed	⊠ Yes □ No If <b>Yes</b> , please state how many: One		
D: State any evidence that union/workers committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	Yes. Through employees interview and document review, no complaint or suggestion from employees in the past 12 months.		
E: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ☐ No Not applicable. There was no CBA.		
F: If <b>Yes</b> what percentage by trade Union/worker representation	N/A% workers covered by Union CBA		% workers covered by er rep CBA
G: If <b>Yes</b> , does the Collective Bargaining Agreement (CBA) include rates of pay	☐ Yes ☐ No N/A. No CBA.		

Good Examples observed:	
None observed	<b>Objective evidence observed:</b> Not applicable



#### 3: Working Conditions are Safe and Hygienic

(Click here to return to NC-table)

(Click here to return to Key Information)

#### ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. The facility provided the meeting minutes of the health and safety committee for review.

2. The facility posted the evacuation plans on work floors, which indicated escape routes and the location of the fire extinguishers. Emergency lights / exit sign were installed to all exits.

3. Sufficient first aid kits stocked with necessary supplies were provided in workshops. Drinkable water was available in workshops. Hygienic and sufficient toilets were provided to employees. Employees were free to go to toilets during the working.

4: Fire extinguishers were inspected once a month with inspection records available for review.

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

- 1. Injury logs were reviewed and they showed the details of each work related accident.
- 2. External first aid training records indicated the facility had invited the hospital to have training for the employees this year.
- 3. New employee's job training record was reviewed. The trainings were conducted by their supervisors.
- 4. Fire drills were conducted twice a year (on October 21, 2015 and May 13, 2015 respectively).
- 5. Facility tour
- 6. Management interview
- 7. Employee interview

Non-compliance:



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

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

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



#### 4: Child Labour Shall Not Be Used

(Click here to return to NC-table)

(Click here to return to Key Information)

#### ETI

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### **Current systems:**

1. From the facility tour, it was noted that there were no children on site.

2. The facility verified all employees' original ID cards at the time of recruitment and keeps the photocopies of employee' ID cards in the personnel files.

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

1. The employees' personnel files included a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card listed the employee's name, household address and the date of birth.

2. Child labour policy stated that the facility will never employ or use any child labor under the age of 16 years old.

3. Facility tour

4. Management interview

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

**Observation:** 



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

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



#### 5: Living Wages are Paid

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

#### ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Benefits such as paid annual leave and official holidays were provided to all employees.

2. The number of employees on payroll records was consistent with the number of employees in the employee register.

3. Employees' wages were paid monthly on 5<sup>th</sup> day of each month in cash. Full attendance awards and so on were provided for employees.

4. The local minimum wage standard was set at RMB 1130 per month equivalent to RMB6.49 per hour (1130/21.75/8) since 1st May, 2015.

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

1. Payroll records from December 2014 to November 2015 and attendance records from 1st December 2014 to 24<sup>th</sup> December 2015 were reviewed.

2. Wages and benefits policy indicated that the employees will enjoy the benefits such as annual leave.

3. Daily production records, IQC reports, IPQC reports and Finished Production Inspection Records and Material Requisition Records were reviewed.

4. Employee interviews

#### Non-compliance:

#### 1. Description of non-compliance:

NC against ETI NC against Local Law Insufficient social insurance participated. Through document review, auditor found that only 11 out of 20 employees had participated in basic endowment insurance, employment injury insurance, basic medical insurance, unemployment insurance and maternity insurance. During employee interview, 4 out of 10 (40%) randomly selected employees stated that they did not participate in the social insurances, and 10 out of

# Objective evidence observed:

1: Social insurance receipts review 2: employees interview and facility accounting staff interview



10 (100%) of interviewees said the they had participated in the commercial injury insurance.	3: Payroll records review
Local law and/or ETI requirement: Local Law: In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state. Article 53	
<b>ETI 5.1:</b> Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	
<b>Recommended corrective action:</b> It is recommended that the facility should ensure all employees participate in social insurance according to the Law.	
(Recommended Completion Timescale: 60 days)	

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

Good Examples observed:	
Description of Good Example (GE):	<b>Objective Evidence</b>
The facility had all employees participated in the commercial injury insurance covering	<b>Observed:</b>
the period of 14 May 2015 to 13 May 2016.	Insurance report review



Wages analysis: (Click here to return to Key Information)				
A: Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	10 samples from November 2015 (current month) 10 samples from June 2015 (non-peak month) 10 samples from December 2014 (peak month)			
B: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	☐ Yes ⊠ No	If <b>Yes</b> , please give details:		
C: If there are different legal minimum grades, are all workers graded correctly?	□ Yes       If No, please give details:         □ No       N/A			
D: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance and personal income tax if necessary.			
E: Have all of these deductions been made? Please list all deductions that have/have not been made.	☐ Yes ⊠ No	If <b>Yes</b> , Please list all deductions that have been made: N/A		
		If <b>No</b> , please give details on any deductions which have <b>not</b> been made: During the payroll records review and interview, there was no any deduction item happened to employees in this facility. The facility paid insurance fee.		
F: Industry norm for this region: (please include time period e.g. hour/week/month)	N/A			

Wages table (Click here to return to Key information)					
Worker Type	Process Operator (Lowest paid)	Process Operator (Highest paid)			
Select from individual worker records one worker from, lowest, average and highest wages and populate the boxes. Ensure comparison is made for same pay period and only uses full-time workers. See SMETA Best Practice Guidance and Measurement Criteria for completing this:					
A: Pay period: (State month selected)					
B: <u>Anonymous</u> Employee Packing / Employee A / Operator O			Cutting / Employee C / Operator		
C: Employee Gender	male	male	female		
D: Contracted/Standard	150 hours / month	160 hours / month	160 hours / month		



		1	· · · · · · · · · · · · · · · · · · ·
working hours: (excluding OT – please include time period e.g. hour/week/month)			
E: Contracted /Standard work pay rate: (excluding OT – please include time period e.g. hour/week/month)	RMB8.62 / hour	RMB8.62 / hour	RMB8.62 / hour
F: Standard day overtime – hours: (please include time period e.g. hour/week/month)	16 hours/ month	18 hours / month	18 hours / month
G: Standard day overtime – wage: (please include time period e.g. hour/week/month)	RMB206.90 / month	RMB232.76 / month	RMB232.76 / month
H: Rest day overtime – hours: (please include time period e.g. hour/week/month)	40 hours / month	40 hours / month	40 hours / month
I: Rest day overtime – wage: (please include time period e.g. hour/week/month)	RMB689.66 / month	RMB689.66 / month	RMB689.66 / month
J: Statutory Holiday overtime – hours: (please include time period e.g. hour/week/month)	0 hour / month	0 hour / month	0 hour / month
K: Statutory holiday OT – wages: (please include time period e.g. hour/week/month)	RMB0 / month	RMB0/ month	RMB0 / month
L: Total overtime hours: (please include time period e.g. hour/week/month)	56 hours / month	58 hours / month	58 hours / month
M: Incentives/Bonus/ Allowances etc.: (please include time period e.g. hour/week/month)	RMB285 / month	RMB400 / month	RMB600 / month
N: Gross wages: (please include time period e.g. hour/week/month)	RMB2491.9 / month	RMB2701.7 / month	RMB2901/72 / month
O: Social insurance and other deductions; please list which and amount.	RMB 0 /month	RMB0 / month	RMB0 / month



P: Actual wage paid after deduction: (please include time period e.g. hour/week/month)	RMB2491.9 / month		RMB2701.7 / month	RMB2901/72 / month
Comments: (Please state here any specific reasons/circumstances that explain the lowest and highest gross wages)				
Employees' social insurance fee was at the facility's expense as per the documents review and interview.				
Q: Is there a defined living way This is <u>not normally</u> minimum I wage. If answered Yes please amount and source of info: Please see SMETA Best Practice Guidance and Measurement Crite	egal state e	☐ Yes ⊠ No Please specify amount/time period: N/A		
R: Are workers paid in a timely manner in line with local law?		⊠ Yes □ No		
S: Is there evidence that equal are being paid for equal work:	rates	Yes No Details: Through facility rules review, payroll records review and employees' interview, it was confirmed that equal rates were being paid for equal work.		
T: How are workers paid:		Cash Cheque Bank Transfer Other If other explain: N/A	λ	



#### 6: Working Hours are not Excessive (Click here to return to NC-table) (Click here to return to Key Information)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <u>all</u> of the following are met:

- this is allowed by national law;

- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;

- appropriate safeguards are taken to protect the workers' health and safety; and

- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

1. Through employees' interview, overtime is voluntary.

2. The facility defined standard work week as 8 hours per day and 5 days per week, the maximum continuously working day was 6 days, the highest number of total daily working hours worked were 10 hours.

3. The facility used electronic attendance system to record employee's time in and time out records.

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

1. Working hours' policy was provided for review. The policy was to ensure employees' working hours and rest day conditions comply with national laws.

2. Payroll records from December 2014 to November 2015 and attendance records from 1st December 2014 to 24<sup>th</sup> December 2015 were reviewed.

3. Daily production records, IQC reports, IPQC reports and Finished Production Inspection Records and Material



Requisition Records were reviewed. 4. Employee interview

Non–compliance:	
<b>1. Description of non–compliance:</b> NC against ETI NC against Local Law Overtime hours exceeded the legal requirement. Through document review, auditor found that the monthly overtime hours of 10 out of 10 randomly selected employees ranged from 40 to 56 hours in December 2014 (peak month) and 56 to 58 hours in November 2015 (current month). During employee interview, 10 out of 10 randomly selected employees stated that their daily overtime hours did not exceed 3 hours and they had at least one day off per week.	Objective evidence observed: 1: Attendance records review 2: management interview and employees interview
<b>Local law and/or ETI requirement:</b> <b>ETI</b> 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.	
Local law:	
In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.	
Recommended corrective action: It is recommended that the facility should reduce the overtime hours to ensure it is within 36 hours per month.	
(Recommended Completion Timescale: 60 days)	

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



Good Examples observed:				
Description of Good Example (GE): None observed			<b>Objective Evidence Observed:</b> Not applicable	
Working hours analysis Please include time period e.g. hour/week/month (Go back to Key information)				
Systems & Processes	-			
A. What timekeeping systems are used: time card etc.	Electronic attendance records			
B: Sample Size Checked (State number of worker records checked and from which weeks/months and type – should be current, peak and random/low: See SMETA Best Practice Guidance and Measurement Criteria)	10samples from November 2015 (current month) 10samples from June 2015 (non-peak month) 10samples from December 2014 (peak month)			
C: Do ALL workers have contracts/employment agreements?	⊠ Yes □ No	If NO, state which type of work contracts/employment agreem N/A		
D: Are standard/contracted working hours defined in <b>all</b> contracts/employment agreements?	⊠ Yes □ No	If NO, please state which type standard hours defined in contagreements.		
		N/A		

If YES, Please complete as appropriate:

Variable hrs

Part time

If "Other", Please define:

0 hrs

🗌 Yes

🖂 No

E: Are there any other types of

used?

contracts/employment agreements

Other



		N/A	
Standard/Contracted Hours worked			
F: Do standard/contracted standard hours ever exceed the law <b>or</b> 48 hours per week?	☐ Yes ⊠ No	If YES give details and comparison (local law/48 hrs week)	
nours per week?		N/A	
G: What are the actual standard/contracted hours worked in sample (State per week/month)		40 hours in November 2015 (current month) / week; 40 hours in June 2015 (non-peak month) / week; 40 hours in December 2014 (peak month) / week	
		40 hours in November 2015 (current month) / week; 40 hours in June 2015 (non-peak month) / week; 40 hours in December 2014(peak month) / week	
H: Any local waivers/local law or permissions which allow	☐ Yes ⊠ No	If YES, Please give details	
averaging/annualised hours for this site?		N/A	
Overtime Hours			
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	58 hours in November 2015 (current month) / month; 18 hours in June 2015 (non-peak month) / month; 56 hours in December 2014 (peak month) / month	
	Lowest OT hours:	56hours in November 2015 (current month) /month; 16hours in June 2015 (non-peak month)/ month; 40hours in December 2014 (peak month)/ month	
J: Range of overtime hours over all workers/or as large a sample as possible. (State per week/month and details)	_16_ to _18_ in	November 2015(month) _June 2015(month) _December 2014(month)	
K: Approximate percentage of workers on highest overtime hours	90%		
L: Is overtime voluntary?	<ul> <li>Yes</li> <li>No</li> <li>□ Conflicting</li> <li>Information</li> </ul>	Please detail evidence e.g. Wording of contract/employment agreement/handbook/worker interviews/refusal arrangements:	
		Through working hours' policy and employees' interview, the employees would only need to tell the direct supervisor orally if they did not want to have overtime work.	
Overtime Premiums			



M: Is overtime paid at a premium?	⊠ Yes □ No	Please give details of normal day overtime premium as a % of <u>standard</u> wages:				um as	
		□ 0%	□ 1 – 115%	□ 116 – 124%	□ 125 – 149%	⊠ 150 – 199%	□ 200%+
					cility paid ' orking hou		
N: ETI Code requires a prevailing standard to give greatest worker protection. If a site pays less than 125% OT premium <u>and</u> this is allowed under local law, are there other considerations? Please complete the	no/low overtime p	idated pay (May be standard wages above minimum legal wage, with rtime premium) ive Bargaining agreements				ge, with	
boxes where relevant. Multi select is possible.	Please explain any checked boxes in N above e.g. detail of consolidated pay CBA or Other.					dated	
	N/A						
Rest Days							
O: Are workers provided with 1 day off in every 7–day–period, or 2 in 14– day–period (where the law allows)?	⊠ Yes □ No	Maximum number of days worked without a day off (in sample):			off (in		
		<ul> <li>6 days worked without a day off in November 201 (current month) / month;</li> <li>6 days worked without a day off in June 2015 (non-pea month) / month;</li> <li>6 days worked without a day off in December 2014 (peal month) / month</li> </ul>				non-peak	
Total Hours							
P: Range of total hours: (Quote highest and lowest please include time period e.g. hour/week/month)	Highest total hours	218hours in November 2015 (current month)/ month; 194hours in June 2015 (non-peak month)/ month; 232hours in Demcember 2014 (peak month)/ month			,		
	Lowest total hours	192 hour	s in June	2015 (non	5 (current r -peak mor 4 (peak mo	nth) / mont	h;
R: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. Multi select is possible.	Onsite Collect Safeguards a Site can dem Other reason	Overtime is voluntary         Onsite Collective bargaining allows 60+ hours/week         Safeguards are in place to protect worker's health and safety         Site can demonstrate exceptional circumstances         Other reasons         'A: The weekly hours did not exceed 60.					



	Please explain any checked boxes in R above	
	N/A	
Comments: (please state here any specific reasons/circumstances that explain the highest working hours)		
After cross-checking the documents (production-related records, payroll records and attendance records), there was no inconsistency found the working hours could be verified in this audit.		





## 7: No Discrimination is Practiced

(Click here to return to NC-table)

#### ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

## Current systems:

Through employees' interview, management interview and documents review :

1. There was no discrimination in hiring, compensation, access to training, promotion, termination or retirement.

2. The facility provided the same pay to male/female employees.

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

1. Non-discrimination policy was provided for review and it showed that no discrimination was available in hiring, compensation, access to training, promotion, termination or retirement.

2. Facility tour

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

Observation:		
	Objective evidence observed:	



Local law or ETI requirement: Not applicable	Not applicable
<b>Comments:</b> Not applicable	

Good Examples observed:		
None observed	<b>Objective Evidence</b> <b>Observed:</b> Not applicable	



#### 8: Regular Employment Is Provided

(Click here to return to NC-table)

(Click here to return to Key Information)

#### ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### Current systems:

The facility signed labor contracts with employees within 30 days after employment. Employees had a copy of the contract in their own language and received the pay slip in their own language. No temporary employees were noted in the facility. There was no sub-contracting or home-working from the site.

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

- 1. Personnel files were checked and they all included a copy of employee's contract.
- 2. Management interview and employee interview

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



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

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



## 8A: Sub–Contracting and Homeworking

(Click here to return to NC-table)

(Click here to return to Key Information)

8A.1. There should be no sub-contracting unless previously agreed with the main client. 8A.2. Systems and processes should be in place to manage sub-contracting, homeworking and external

should be in place to manage sub-contracting, no processing.

Note to auditor on homeworking:

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

in place.

## Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

## Current systems:

It was verified through documentation review, facility tour and management interview that no home-working or subcontracting was used by this facility.

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

1. Incoming material inspection records and materials receiving records were reviewed, and there was no sign of sub-contracting or home-working.

2. Facility tour



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

Observation:		
Description of observation: None observed	<b>Objective evidence</b> <b>observed:</b> Not applicable	
Local law or ETI/Additional elements requirement: Not applicable		
Comments: Not applicable		

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



Summary of sub–contracting – if applicable		
A: If sub–contractors are used, is there evidence this has been agreed with the main client?	<ul> <li>Yes</li> <li>No</li> <li>If <b>Yes</b>, summarise details:</li> <li>N/A. No sub-contractor was used in the facility.</li> </ul>	
B: Number of sub– contractors/agents used	None	
C: Is there a site policy on sub- contracting?	Yes No If <b>Yes</b> , summarise details: N/A	
D: What checks are in place to ensure no child labour is being used and work is safe?	N/A	
E: What processes are sub- contracted?	N/A	

Summary of homeworking – if applicable			
F: If homeworking is being used, is there evidence this has been agreed with the main client?	Yes No N/A, no home-worker was found in the facility. If <b>Yes</b> , summarise details: N/A		
G: Number of homeworkers	Male: None	Female: None	Total: None
H: Are homeworkers employed direct or through agents?	<ul> <li>Directly</li> <li>Through Agents</li> <li>N./A. No home-worker was found in the facility.</li> </ul>		
I: If through agents, number of agents	N/A. No home-worker was found in the facility.		
J: Is there a site policy on homeworking?	☐ Yes ⊠ No		
K: How does site ensure worker hours and pay meet local laws for homeworkers?	N/A, no home-worker was found in the facility.		
L: What processes are carried out by homeworkers?	N/A, no home-worker wa	s found in the facility.	
M: Are written agreements in place for homeworkers that include regular employment?	☐ Yes ☐ No N/A, no home-worker wa	s found in the facility.	



N: Are full records available at the site?	☐ Yes ☐ No
	$\overline{N/A}$ , no home-worker was found in the facility.

. . . . . . .



## 9: No Harsh or Inhumane Treatment is Allowed

(Click here to return to NC-table)

## ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown tsupport the systems.

## Current systems:

Through the facility management and employees' interview, it was noted that no physical abuse or discipline happened in the facility and the disciplinary procedure of the facility was verbal warning and education. Employees were not under any intimidation (physical or verbal) for not completing the job on time, high defect rate or late for work.

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

1. Facility's disciplinary rules and anti-harsh treatment policy were reviewed. They stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

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

Observation:		
None observed	<b>Objective evidence</b> <b>observed:</b> Not applicable	
Local law or ETI requirement:		



Not applicable	
Comments: Not applicable	

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





#### 10. Other Issue areas: 10 A: Entitlement to Work and Immigration (Click here to return to NC-table)

#### **Additional Elements**

10A1 Only workers with a legal right to work shall be employed or used by the supplier.

10A2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

10A3 Employment agencies must only supply workers registered with them.

10A4 The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

#### **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

#### **Current systems:**

Only employees with a legal right to work shall be employed or used by the facility. There were no agency staffs, employment agencies or immigration employees in the facility.

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

1. Employment contracts and hiring policy were reviewed and they contained the clause that only employees with a legal right to work will be hired by the company.

2. Management interview and employee interview

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

Observation:



Description of observation:         None observed         Local law or ETI/Additional Elements requirement:         Not applicable	<b>Objective evidence observed:</b> Not applicable
<b>Comments:</b> Not applicable	

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



#### 10. Other issue areas 10 B 2: Environment 2-pillar

(Click here to return to NC-table)

To be completed for a 2-Pillar SMETA Audit, and remove the following page which is 10B4 environment 4 pillar

10B2. 1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2. 2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

## **Current Systems and Evidence Examined**

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

## Current systems:

- 1. The facility had a written environmental policy.
- 2. One senior manager was responsible for continuous improvements in their environmental performance.
- 3. The facility had provided the Environment Impact Evaluation Report and Approval for review.

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

1. Environmental policies were provided for review. They showed that the facility gained some necessary environmental permits complying with the requirements of local laws and regulations.

Non–compliance:		
NC against Local Law	<b>Objective evidence observed:</b> Not applicable	



Observation:		
Description of observation: None observed	<b>Objective evidence</b> <b>observed:</b> Not applicable	
Local law or ETI/additional elements requirement: Not applicable		
<b>Comments:</b> Not applicable		

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



## **Worker Interview Summary**

Worker Interview Summary		
A: Were workers aware of the audit?	⊠ Yes □ No	
B: Were workers aware of the code?	⊠ Yes □ No	
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria)	1 groups of 4 members (3 males and 1 female)	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 2 males	Female: 4 females
E: Total number of interviewed workers (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 5 males	Female: 5 females
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	∑ Yes □ No	
G: In general, what was the attitude of the workers towards their workplace?	<ul> <li>☑ Favourable</li> <li>☐ Non-favourable</li> <li>☐ Indifferent</li> </ul>	
H: What was the most common worker complaint?	No complaint.	
I: What did the workers like the most about working at this site?	General working condition was good	
J: Any additional comment(s) regarding interviews:	None	
K: Attitude of workers to hours worked:	Very good	

Agency Workers (if applicable) (workers sourced from a local agent who are not directly paid by the site)		
A: Number of agencies used (average):	None And names if available: N/A. The facility hired employees directly.	



B: Were agency workers'	☐ Yes
age/pay/hours included within scope	☐ No
of this audit	N/A. The facility hired employees directly.
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No N/A. The facility hired employees directly.

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## **Other findings**

Other Findings Outside the Scope of the Code

None observed

## **Community Benefits**

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

None observed



## **Photo Form**

**Best Practice Photos:** 

None observed	None observed	None observed
N/A	N/A	N/A

Non Compliance Photos:

None observed	None observed	None observed
N/A	N/A	N/A

General Site Tour Photos:







Packing

Warehouse

Emergency Light / Exit Sign









Electrical Panel

Proper Lighting in Warehouse

Poster of Working Hours / Wages



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

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

<u>Click here for A & AB members:</u> <u>http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3Inq5Iw\_3d\_3d</u>

<u>Click here for B members:</u> <u>http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d</u>

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<u>Click here for B members:</u> <u>http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY\_2brg\_3d\_3d</u>

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