



# Sedex Members Ethical Trade Audit Report

**Version 6.1**



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC422726107	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS422726110	
Business name (Company name):	Foshan mingjun weaving co ltd			
Site name:	Foshan mingjun weaving co ltd			
Site address:	3rd and 4th floor, Industry Stree, Industry Zone Lishui Town, Nanhai District Guangdong Province, China 528200 CN	Country:	CN	
Site contact and job title:	Ms. Wang Liupei / HR Supervisor			
Site phone:	13649822931	Site e-mail:	nicolezhao@globalh.com.cn	
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar	<input type="checkbox"/> Business Ethics
Date of Audit:	2023-09-07			

Audit Company Name:
QIMA Ltd

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			

## Audit Content:

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

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

### **2-Pillar SMETA Audit**

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

### **4-Pillar SMETA**

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

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

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

## SMETA Declaration

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

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Phillip Hu	APSCA Number:	21701344
Additional Auditors:			
Date of declaration:	2023-09-07		

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

Site Representation	
Full Name:	Ms. Wang Liupei
Title:	HR Supervisor
Date of declaration:	2023-09-07
<b>Comments:</b> <i>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
Nil	

## Summary of Findings

Issue <small>(please click on the issue title to go direct to the appropriate audit results by clause)</small>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>0A - Universal rights covering UNGP</u>	0.A.1 0.A.3 0.A.4 0.A.6		0	4	0	Obs - ZAF600155746 Obs - ZAF600155749 Obs - ZAF600155752 Obs - ZAF600155755
<u>0B - Management systems and code implementation</u>	0.B.1 0.B.1 0.B.3 0.B.4 0.B.5 0.B.5		2	4	0	NC - ZAF600155758 NC - ZAF600155761 Obs - ZAF600155764 Obs - ZAF600155766 Obs - ZAF600155768 Obs - ZAF600155770
<u>1 - Freely chosen employment</u>	1.1 1.1		0	2	0	Obs - ZAF600155772 Obs - ZAF600155773
<u>2 - Freedom of association and right to collective bargaining are respected</u>			0	0	0	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1 3.1	§1 §10 §11 §12 §13 §14 §15 §16 §17 §18 §2 §3 §4 §5 §6 §7 §8 §9	18	0	0	NC - ZAF600155775 NC - ZAF600155777 NC - ZAF600155779 NC - ZAF600155781 NC - ZAF600155783 NC - ZAF600155785 NC - ZAF600155787 NC - ZAF600155789 NC - ZAF600155791 NC - ZAF600155792 NC - ZAF600155794 NC - ZAF600155796 NC - ZAF600155798 NC - ZAF600155800 NC - ZAF600155801 NC - ZAF600155803 NC - ZAF600155804 NC - ZAF600155806
<u>4 - Child labour shall not be used</u>			0	0	0	
<u>5 - Living wages are paid</u>	5.1 5.1 5.1 5.1 5.1	§19 §20 §21 §22 §23	5	0	0	NC - ZAF600155808 NC - ZAF600155810 NC - ZAF600155812 NC - ZAF600155814 NC - ZAF600155824
<u>6 - Working hours are not excessive</u>	6.1 6.1 6.1	§24 §25	3	0	0	NC - ZAF600155816 NC - ZAF600155818 NC - ZAF600158979
<u>7 - No discrimination is practiced</u>			0	0	0	
<u>8 - Regular employment is provided</u>	8.7	§26	1	0	0	NC - ZAF600155822
<u>8A - Subcontracting and homeworking</u>			0	0	0	
<u>9 - No harsh or inhumane treatment is allowed</u>			0	0	0	
<u>10A - Entitlement to work and immigration</u>			0	0	0	
<u>10B2 - Environment 2-pillar</u>	10.B2.1	§27	1	0	0	NC - ZAF600155820
<u>10B4 - Environment 4-pillar</u>			0	0	0	
<u>10C - Business ethics 4-pillar</u>			0	0	0	

## Local Law Issues

Issue	Description
§1	In accordance with Labor Law of the People's Republic of China (1994), Article 54.
§2	In accordance with Fire Prevention Law of the People's Republic of China (2008), Article 16.
§3	In accordance with Code of Design on Building Fire Protection and Prevention (GB50016-2006), Article 11.3.4.
§4	In accordance with Code for Design of Extinguisher Distribution in Buildings (GB50140-2005), Article 5.1.3.
§5	In accordance with PRC Fire Prevention Law article 28.
§6	In accordance with Code of Design on Building Fire Protection and Prevention (GB50016-2006), Article 7.4.12.
§7	In accordance with Regulations on Labor Protection in Workplaces Where Toxic Substances Are Used, Article 23.
§8	In accordance with Regulations on Labor Protection in Workplaces Where Toxic Substances Are Used, Article 23.
§9	In accordance with PRC Fire Prevention Law article 28.
§10	In accordance with Code of Design on Building Fire Protection and Prevention (GB50016-2006), Article 11.3.4.
§11	In accordance with Construction Law of the People's Republic of China (2011 Amendment), Article 61.
§12	In accordance with Fire Prevention Law of the People's Republic of China (2008) Article 11 and 13.
§13	In accordance with Hygienic Standards for the Design of Industrial Enterprises (GBZ 1-2010), Article 8.1.
§14	In accordance with Production Safety Law of the People's Republic of China, Article 27.
§15	In accordance with Provisions on the Supervision and Administration of Occupational Health at Work Sites (2012), Article 20.
§16	In accordance with Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2011 Amendment), Article 36.
§17	In accordance with Food Safety Law of the People's Republic of China (2009), Article 29.
§18	In accordance with Food Safety Law of the People's Republic of China (2009), Article 34.
§19	In accordance with Labor Law of the People's Republic of China (1994), Article 72, 73.
§20	In accordance with Labor Law of the People's Republic of China (1994), Article 48.
§21	In accordance with Labor Law of the People's Republic of China (1994), Article 44.
§22	It violated Regulations on the Payment of Wages in Shenzhen City (2004), Article 11.
§23	Payment of Wages Tentative Provisions (1994), Article 6
§24	In accordance with Labor Law of the People's Republic of China (1994), Article 41.
§25	In accordance with Labor Law of the People's Republic of China (1994), Article 38.



§26	Labor Contract Law of the People's Republic of China (2012 Amendment), Article 17
§27	In accordance with Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution (2000 Revision), Article 13.

## Site Details

Site Details			
Company Name	Foshan mingjun weaving co ltd		
Site Name	Foshan mingjun weaving co ltd		
GPS location (if available)	GPS Address:	Floor 3 and 4, No. 11 Industry stree Dabu Development Industrial Park, Lishui Town, Nanhai district Foshan City, Guangdong, China	
	Coordinates:	113.153 North, 23.144 East	
Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business License #: 91440605MA55MWJA0J Valid from 04-Dec-2020 to long term		
Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	Socks Knitting-Linking-Inspection-Packing		
Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	FOSHAN MING JUN WEAVING Co.,LTD was located at Floor 3 and 4, No. 11 Industry stree Dabu Development Industrial Park, Lihui Town, Nanhai district Foshan City, Guangdong, China. There were about 6800 m2 for production area/warehouse/office and there are 99 employees working at the facility. The factory has moved to new location (next to the old location) in 2021, the business location showed on the business license is "No. 6 Dabu Development Industrial Park, Lihui Town, Nanhai district Foshan City, Guangdong, China" while the actual location is "Floor 3 and 4, No. 11 Industry stree Dabu Development Industrial Park, Lihui Town, Nanhai district Foshan City, Guangdong, China." The factory terminated the canteen in August 2023, the related termination lease agreement was provided for review during the audit. It was also double-conformed by all interviewed workers. As the system limitation, the all NC corrected photos were uploaded in attachment.		
Structure and number of buildings	Building Name:		Production building
	Floor	Description	Remark
	1	Another factory	Nil
	2	Another factory	Nil
	3	Finished goods warehouse, knitting, packing, linking, inspection; another factory	Nil
	4	Knitting, raw material warehouse, office	Nil
	5-12	Another factory	Nil
Visible structural integrity issues (large cracks) observed?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Per site tour, no visible structural integrity issues were observed.		



Does the site have a structural engineer evaluation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The building structure safety approval for review.
Site function	<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Factory Processing/Manufacturer <input type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack house <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-contractor
Months of peak season	September to December
Process overview	The company specialised in manufacture of socks. Main process includes: Knitting-linking-Inspection-Packing number of production lines: 4 The main equipment used in the factory include: knitting machines and linking machines.
What form of worker representation is there on site?	<input type="checkbox"/> Union <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other <input type="checkbox"/> None
Please give details:	Nil
Is there any night production work at the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any on site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:
Were all site provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Partial follow up audit on September 7,2023 No dormitory was provided by the factory.

Audit Parameters			
Time in and time out	Day 1		
	In	09:30	
	Out	17:00	
Audit type:	PARTIAL_FOLLOW_UP		
Was the audit announced?	ANNOUNCED		
Who signed and agreed CAPR	Ms. Wang Liupei / HR Supervisor		
Is further information available	No		

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	No	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	No union was established in the factory.		
<i>Reason for absence during the audit</i>	No union was established in the factory.		
<i>Reason for absence at the closing meeting</i>	No union was established in the factory.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*			Home workers	Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency		
Worker numbers – male	13	0	0	25	0	0	0	38
Worker numbers – female	17	0	0	44	0	0	0	61
Total	30	0	0	69	0	0	0	99
Number of Workers interviewed – male	2	0	0	2	0	0	0	4
Number of Workers interviewed – female	1	0	0	5	0	0	0	6
Total – interviewed sample size	3	0	0	7	0	0	0	10

Nationalities Structure		
Nationality of Management	Chinese	
Please list the nationalities of all workers, with the three most common nationalities listed first.	Nationality 1: CHINESE approx %: 100%	
Was this list completed during peak season?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:	
Worker remuneration	Workers on piece rate:	0%
	Paid hourly:	100%
	Salaried:	0%
Payment cycle	Paid daily:	0%
	Paid weekly:	0%
	Paid monthly:	100%
	Other:	0%
	Details for other:	Nil

Worker Interview Summary	
Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Number of group interviews:	1 group with 4 workers
Number of individual interviews:	Male: 2 Female: 4
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.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> Favorable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent
What was the most common worker complaint?	All workers interviewed had a positive attitude to management and site.
What did the workers like the most about working at this site?	Working environment and colleagues' relationship.
Any additional comment(s) regarding interviews:	Most workers enjoyed working at this factory, they felt they had sufficient work and had a good relationship with management in general.
Attitude of workers to hours worked:	Workers expressed that they sometimes wanted to work extra, to earn more money, however they could turn down overtime if they wanted.
Is there any worker survey information available?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:



Attitude of workers:
10 employees were selected for the interview. All the interviewees were favourable with the management and working condition, and no negative information was raised.
Attitude of worker's committee/union reps:
The worker representative was favourable with the management and working condition, and no negative information was raised.
Attitude of managers:
The factory management was found to be cooperative throughout the audit.

## 0A - Universal Rights covering UNGP [Summary of Findings]

### 0A: Compliance Requirements

0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.

0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights

0.A.3 Businesses shall identify their stakeholders and salient issues.

0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.

0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter. Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

## Current Systems and Evidence Examined

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

### Current Systems:

1. Businesses did not have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
2. Wang Liupei (Factory Supervisor) was responsible for implementing standards concerning Human Rights.
3. Businesses did not identify their stakeholders and salient issues.
4. Businesses did not measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.

### Partial follow up audit on 7-Sep-2023

The factory established CSR management manual and related procedures, and sign CSR commitment letter with all suppliers. And the factory also conducted CSR audit for all suppliers.

The factory conducted Labor and ethical risk assessment and raised related prevent actions for it in June 2023

Remark: For the observation issue "ZAF600155746", the auditor attempted to learn how to operate the sedex system and clicked on "accept" and then immediately clicked on "submit". However, the auditor was no longer able to make any changes to the related content after submitting, so this area was leave blank.

The correct comment should be "The factory established CSR manual and related CSR procedures, and signed CSR commitment letter with all suppliers, and conducted ETI communication meeting with all suppliers' representatives on August 18,2023."

### Evidence examined:

#### Details:

Employee handbook, some anonymous grievance material from the confidential email

### Any other comments:

Nil

Policy statement that expresses commitment to respect human rights?

☒ Yes ☐ No

Please give details:

The policy was not posted in notice board and not communicated with all employees and suppliers. Partial follow up audit on 07-Sep-2023 There was a policy statement that expresses commitment to respect human rights.

Are the policies included in workers' manuals?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The policies were not included in workers' manuals. Partial follow up audit on 07-Sep-2023 All the policies were included in workers' manuals.
Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: Wang Liupei Job title: HR supervisor
Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory did not have a written complaint policy, and not communicate with personnel verbally or in written, appeal to general manager, putting letter into the suggestion box. Partial follow up audit on 7-Sep-2023 The factory established the employee grievance management procedure, and provided the suggestion box opening records for review. Confirmed by workers interview, the factory provided the verbal training to all workers.
Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employee information and personnel files are kept locked away in the human resources office and only viewed by the HR manager and his team.
<b>Measuring Workplace Impact</b>	
Annual worker turnover(Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover))	Last year 6.0% This year 5.0%
Current % quarterly (90 days) turnover(Number of workers leaving from the first of the 90 day period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2])	4.0%
Annual % absenteeism(Number of days lost through job absence in the year / [(number of employees on 1st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year)	Last year 0.0% This year 0.0%

Quarterly (90 days) % absenteeism(Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period / 2] * Number of available workdays in the month)	0.0%
Are accidents recorded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  The factory kept a documented records of accidents. There were no accidents recorded for the past year.
Annual Number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
Quarterly (90 days) number of work related accidents and injuries per 100 workers((Number of work related accidents and injuries * 100) / Number of total workers)	0.0%
Lost day work cases per 100 workers([(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers)	Last year 0.0% This year 0.0%
% of workers that work on average more than 48 standard hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%
% of workers that work on average more than 60 total hours / week in the last 6 / 12 months	6 month 0.0% 12 month 0.0%

Observation		Evidence																														
<a href="#">[Back to findings summary]</a>																																
<table><tr><th colspan="2">Observation</th></tr><tr><td>Status</td><td>CLOSED</td></tr><tr><td>Reference</td><td>ZAF600155746</td></tr><tr><td>Clause</td><td>0A - Universal Rights covering UNGP</td></tr><tr><td>Issue Title</td><td>8 - No / inadequate management systems in place (e.g. not appropriate for site context, not effective in ensuring compliance)</td></tr><tr><td>Subcategory</td><td>Site's Management systems &amp; Monitoring</td></tr><tr><td>New or carried over?</td><td><input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over</td></tr><tr><td>Raised by audit</td><td>ZAA600010861</td></tr><tr><td>Resolved by audit</td><td>ZAA600024145</td></tr><tr><td>Root cause</td><td><input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>ETI code</td><td>0.A.1 - Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</td></tr><tr><td>Explanation to the observation</td><td>Businesses did not have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 政策未对所有的合作方和供应项进行沟通</td></tr><tr><td>Actions</td><td>Businesses will establish a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.</td></tr><tr><td>Additional comments</td><td>We will establish a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 我们将制定一项人权政策，由最高层认可，涵盖人权影响和问题，并确保将其传达给所有的合作方和供应项 1st follow up audit on September 7,2023</td></tr></table>			Observation		Status	CLOSED	Reference	ZAF600155746	Clause	0A - Universal Rights covering UNGP	Issue Title	8 - No / inadequate management systems in place (e.g. not appropriate for site context, not effective in ensuring compliance)	Subcategory	Site's Management systems & Monitoring	New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	Raised by audit	ZAA600010861	Resolved by audit	ZAA600024145	Root cause	<input type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	Root cause - Other		ETI code	0.A.1 - Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.	Explanation to the observation	Businesses did not have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 政策未对所有的合作方和供应项进行沟通	Actions	Businesses will establish a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.	Additional comments	We will establish a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers. 我们将制定一项人权政策，由最高层认可，涵盖人权影响和问题，并确保将其传达给所有的合作方和供应项 1st follow up audit on September 7,2023
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## 0B - Management Systems and code Implementation

### [Summary of Findings]

#### 0B: Compliance Requirements

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.

0.B.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.

0.B.3 Suppliers are expected to communicate this Code to all employees.

0.B.4 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with.

0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

### Current Systems and Evidence Examined

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

#### Current Systems:

1. Factory did not implement and maintain systems for delivering compliance to this Code; the factory did not update the new law and regulation on labour timely.

2. No evidence was provided to prove that the factory had communicated this code to their own suppliers and, where reasonably practicable, extends the principles of this Ethical Code through their supply.

Partial follow up audit on 7-Sep-2023

The factory established CSR management system related procedures, and collected related laws and regulations, and provided ETI training to all employees.

The factory signed CSR commitment letter with all suppliers, the basic CSR requirements (such as non child labor and non-discrimination and non-forced labor etc.) were defined in it. In other sides, the factory also conducted CSR audit for all suppliers in June 2023 and conducted ETI communication meeting with all suppliers' representatives on August 18,2023.

#### Evidence examined:

##### Details:

1. During this audit, the social compliance policy, social compliance management manual, local law articles etc. were not provided.

2. The social compliance management system was not complete and properly implemented in the factory.

Partial follow up audit on 7-Sep-2023

The factory established CSR management system related procedures, and collected related laws and regulations, and provided ETI training to all employees.

The factory signed CSR commitment letter with all suppliers, the basic CSR requirements (such as non child labor and non-discrimination and non-forced labor etc.) were defined in it. In other sides, the factory also conducted CSR audit for all suppliers in June 2023 and conducted ETI communication meeting with all suppliers' representatives on August 18,2023.

#### Any other comments:

Nil

### Management Systems

In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?

☐ Yes ☒ No

Please give details:

No fines or prosecutions for non-compliance to any regulations was noted.

Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had not established the policies and procedures for forbidding forced labour, child labour and discrimination, harassment and abuse. Partial follow up audit on 7-Sep-2023 The factory established the policies and procedures for forbidding forced labour, child labour and discrimination, harassment and abuse etc. and provided training to all employees.
If Yes, is there evidence (an indication) of effective implementation? Please give details.	Confirmed by document review and worker interview.
Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory did not provide regular trainings in the standards for forbidding forced labour, child labour, discrimination, harassment and abuse for both management and workers. Partial follow up audit on 7-Sep-2023 The factory established the policies and procedures for forbidding forced labour, child labour and discrimination, harassment and abuse etc. and provided training to all employees.
If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Partial follow up audit on 7-Sep-2023 Confirmed by document review and employee interview.
Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: The factory has not obtained the internationally recognised system certifications.
Is there a Human Resources manager/department?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The factory had a Human Resources department which in charge of the recruitment of employees, assignment of employees' post, etc. and Hr supervisor was available in the factory.
Is there a senior person /manager responsible for implementation of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Wang Liupei (HR supervisor) was assigned as responsible for implementation of the Code.
Is there a policy to ensure all worker information is confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There is a policy to ensure all worker information is confidential.
Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All employees' personal information would be kept and only accessed by authorized staff, such as administrative personnel.

Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessment are not conducted yearly to evaluate policy and procedure effectiveness. Partial follow up audit on 7-Sep-2023 The factory conducted CSR internal audit on June 12,2023 to evaluate the implementation of the CSR system, and conducted CSR management review on June 19,2023 to evaluate the suitability of the CSR system.
Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Risk assessment are not conducted yearly to evaluate policy and procedure effectiveness. Partial follow up audit on 7-Sep-2023 The factory conducted CSR internal audit on June 12,2023 to evaluate the implementation of the CSR system, and conducted CSR management review on June 19,2023 to evaluate the suitability of the CSR system.
Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No evidence showed the facility had a policy which required labour standards of its own suppliers. Partial follow up audit on 7-Sep-2023 The factory established supplier management procedure and signed CSR commitment letter with all suppliers, the basic CSR requirements (such as nonchild labor and non-discrimination and non-forced labor etc.) were defined in it. In other sides, the factory also conducted CSR audit for all suppliers in June 2023 and conducted ETI communication meeting with all suppliers' representatives on August 18,2023.
<b>Land Rights</b>	
Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory obtained all the legal land permits to operate legally in the premises.
Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The premises were leased by local community.
Does the site have a written policy and procedures specific to land rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No policy was established.
Is there evidence that facility/site compensated the owner/lessor for the land prior to the facility being built or expanded?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A. This is not applicable for this factory.



Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A. This is not applicable for this factory.
Is there any evidence of illegal appropriation of land for facility building or expansion of footprint?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no evidence found on illegal appropriation of land for facility building or expansion.

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Explanation to the non compliance	Factory did not implement and maintain systems for delivering compliance to this Code; the factory did not update the new law and regulation on labour timely. 没有系统确保 ETI 的有效实施,未定期更新人权法规和相关标准																																				
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Additional comments	We will establish a social responsibility system to ensure the effective implementation of ETI and arrange for our administrative staff to regularly update human rights regulations and related standards. 我们将建立社会责任体系,确保ETI的有效实施,并安排行政人员定期更新人权法规和相关标准 Partial follow up audit on 7-Sep-2023 Closed The factory established CSR management system related procedures, and collected related laws and regulations, and provided ETI training to all employees.																																				



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## 1 - Freely chosen Employment

### [Summary of Findings]

#### 1: Compliance Requirements

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

1. Based on interview with the management & workers and document review, it was identified that the factory has established the effective employment policies & program.
2. The employees obtained their job by themselves or by recommendation; they were not required to give lodge deposits or their Identity papers to the factory at the beginning of employment, and they were free to leave their employer after reasonable notice (30 days in advance).
3. No forced or bonded labour was found during the audit.

#### Evidence examined:

##### Details:

1. Employment policies & program
2. Labour contract

#### Any other comments:

Nil

Is there any evidence of retention of original documents, e.g. passports/ID' (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of a loan scheme in operation (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Is there any evidence of retention of wages / deposits (If yes, please give details and category of workers affected)

☐ Yes ☒ No

Please give details:

Are there any restrictions on workers' freedom to terminate employment?

☐ Yes ☒ No

Please give details:

There are no restrictions on workers' freedom to terminate their employment.

If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?

☐ Yes ☐ No ☒ Not Applicable

Please give details:

The factory do not have parts of the business in UK or registered there.

Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no evidence of any restrictions observed on workers' freedoms to leave the site at the end of the work day.
Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable Please give details: The facility had commitment letter with their main suppliers in which forced / trafficked / bonded labour were strictly forbidden in their supplier chain.
Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No other steps were taken to reduce the risk of forced / trafficked labour. Based on interview with the management & workers and document review, it was identified that the factory has established the effective employment policies & program. Partial follow up audit on 7-Sep-2023 The factory signed CSR commitment letter with all suppliers and conducted CSR audit for all suppliers. The factory established CSR management system and related CSR procedures, and the CSR internal audit also conducted in the factory. The factory provided CSR training to all employees in July 2023.

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## 2 - Freedom of Association and Right to Collective Bargaining are Respected

### [Summary of Findings]

#### 2: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

1. There is not a worker committee in the factory.
2. Employee interview confirmed that workers have the rights to raise issues with their supervisors and establish the worker representative committee.

Partial follow up audit on 7-Sep-2023

Two employee representatives were elected by the employees freely in June 2023.

#### Evidence examined:

##### Details:

Interview with workers  
Interview with managers

#### Any other comments:

Nil

What form of worker representation/union is there on site? (Please add the name of the union or committee in the textbox)	<input type="checkbox"/> Union <input type="checkbox"/> Other	<input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> None
Other details:	Partial follow up audit on 7-Sep-2023 Two employee representatives were elected by the employees freely in June 2023.	
Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Suggestion box	
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The workers could conduct free deployment without interference or restriction.	

Name of union and union representative, if applicable:	There is no union in the factory.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	No worker committee was established in the factory and workers have the rights to raise issues with their supervisors and establish the worker representative committee.  Partial follow up audit on 7-Sep-2023 The EHS committee was established in the factory, and two employee representatives were also elected by the employees freely.
Is there evidence of free elections?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable
Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  No worker representative committee was established.  Partial follow up audit on 7-Sep-2023 Confirmed by worker interview.
Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Date of last election:	2023-06-02
Do workers know what topics can be raised with their representatives?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If Yes, please state how many:	1.0
Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.	No worker committee was established in the factory and workers have the rights to raise issues with their supervisors and establish the worker representative committee.  Partial follow up audit on 7-Sep-2023 The EHS committee/employee representatives was established in June 2023, the regular meeting was conducted by quarterly.
Are any workers covered by Collective Bargaining Agreement (CBA)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

### 3 - Working Conditions are Safe and Hygienic [Summary of Findings]

#### 3: Compliance Requirements

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

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

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

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

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

### Current Systems and Evidence Examined

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

#### Current Systems:

##### 1. General Health and Safety management

- Wang Liupei (HR Supervisor) was appointed as Health & Safety Manager for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets segregated by gender were available at all times to employees
- Ventilation, temperature and lighting were adequate for the production processes.

##### 2. Fire Safety

- There were at least 2 exits from each work area and most of these were clearly marked.
- Firefighting equipment was adequate and inspected once per month.
- Evacuation map was posted in the production workshop and understood by all employees interviewed.
- Fire drills were organized in the factory.

##### 3. Electrical safety

- All electrical wires and most of electrical equipment were maintained in good condition.
- There was no competent electrician at the site.

##### 4. Chemical safety.

- The chemical was used in the factory and stored properly onsite and no chemical label/MSDS was posted.

##### 5. Medical services

- There were adequate first aid kits in production area.
- No first aider was trained in the factory.

Partial follow up audit on 7-Sep-2023

One qualified electrician was available in the factory.

The MSDS and safety label were available in chemicals using and storage area.

Two qualified first aiders were available in the factory.

The factory installed evacuation sign as local requirements.

All fire extinguishers were accessible and placed as requirements in the production area.

The factory monitored the occupational hazardous factors for the production area and provided noise occupational health examinations for all knitting workers.

The factory provided the construction certificate and fire safety approval for the 12-storey production building for review.

#### Evidence examined:

##### Details:


- Fire equipment maintenance records
- Interviews with H&S manager
- Interviews with employees

Any other comments:


Nil

Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had not established general Health & Safety and occupational Health & Safety policies and procedures and employees were not given relevant training on their entry date. Partial follow up audit on 7-Sep-2023 The factory establish general Health & Safety and occupational Health & Safety policies and procedures and employees were given relevant training.
Are the policies included in workers' manuals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory had not established general Health & Safety and occupational Health & Safety policies and procedures and employees would be given relevant training on their entry date. Partial follow up audit on 7-Sep-2023 All the policies were included in workers' manuals.
Are there any structural additions without required permits/inspections (e.g. floors added)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: There are no structural additions in this factory at the time of audit. Partial follow up audit on 7-Sep-2023 The factory provided the construction certificate for the 12-storey production building.
Are visitors to the site informed on H&S and provided with personal protective equipment?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: All visitors would be introduced with H&S and provided with personal protective equipment if necessary.
Is a medical room or medical facility provided for workers?(This section is to list evidence to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate))	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: N/A, no medical room or medical facility provided and no such legal requirements. And there was one first aid kit at each floor of facility building.
Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No first aider was trained in the factory. Partial follow up audit on 7-Sep-2023 Two qualified first aiders were available in the factory.
Where the facility provides worker transport – is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: There is no worker transportation available in the factory.

Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: No dormitory was available in the factory.
Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Relevant risk assessment records are not for review. Partial follow up audit on 7-Sep-2023 The H&S risk assessments were conducted and related prevent actions were raised in it.
Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: The factory did perform the environmental elements test, such as boundary noise.
Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: No banned chemical was used in the factory.



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	related termination lease agreement was provided for review during the audit. It was also double-conformed by all interviewed workers.	
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**4 - Child Labour Shall Not Be Used**  
**[Summary of Findings]**

**4: Compliance Requirements**

4.1 There shall be no new recruitment of child labour.

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

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

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

**Current Systems and Evidence Examined**

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

**Current Systems:**

The factory has kept all workers' personnel records with ID copy.

**Remarks:**

In China, minimum age of worker is 16 years old. Workers over 16 and those between 16~18 are regarded as young worker.

**Evidence examined:**

**Details:**

1. Roster, Personal files
2. The copy of the personal ID cards

**Any other comments:**

Nil

Legal age of employment:	16
Age of youngest worker found:	20
Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percentage of under 18's at this site (of total workers)	0.0%
Are workers under 18 subject to hazardous work assignments?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:  No child labour or young worker was found during this audit.

## 5 - Living Wages are Paid [Summary of Findings]

### 5: Compliance Requirements

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

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

1. Factory only kept 6 months attendance records and payroll records during audit.
2. All workers were paid at hourly rate; the wages included normal basic wage, overtime wage, statutory holiday wage and allowance etc.
3. The minimum wage was RMB 10.92 per hour (the local minimum wage standard RMB 10.92 per hour since 01-Dec-2021).
4. The wages were paid by cash and bank-transfer by 6th to release the wage for the month before last.

Partial follow up audit on 7-Sep-2023

The factory provided the payroll records from June 2023 to July 2023 for review during the audit.

The factory paid the Minimum wage to all workers as RMB 1900 per month, it was complied with local requirements.

overtime hours were paid with legal premium. 150% of normal wages for overtime on weekdays 200% of normal wages for overtime on rest days. No overtime work on holidays.

The factory paid the salary to all workers on 30th of the each month by bank transfer. And the salary date defined in labor contract was revised to 30th of the next month at the same time.

### Evidence examined:

Document review  
Employee interview  
Local legal minimum wage documents  
Leave & resignation records  
Daily production records

### Any other comments:

Nil

## Summary Information

Criteria	Local Law	Actual at the Site	Is this part of a Collective Bargaining Agreement?
Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal Maximum Per Day: 8.0 Per Week: 40.0 Per Month: null	Actual Per Day: 8.0 Per Week: 40.0 Per Month: 0.0	NO

Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal Maximum Per Day: 3.0 Per Week: null Per Month: 36.0	Actual Per Day: 2.0 Per Week: 16.0 Per Month: 76.0	NO
Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: 1900.0	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 1900.0	NO
Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal Maximum Per Day: null Per Week: null Per Month: null	Actual Per Day: 0.0 Per Week: 0.0 Per Month: 1900.0	NO
<b>Wages Analysis:</b>			
Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Size Checked (State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)	Mar 2023, Dec 2022 and Oct 2022  Partial follow up audit on 7-Sep-2023 June 2023 and July 2023		
Are there different legal minimum wage grades? If Yes, please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Applicable  Please give details:		
For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	<input type="checkbox"/> Below legal min <input checked="" type="checkbox"/> Meet <input type="checkbox"/> Above		
Lowest actual wages found: Note: full time employees and please state hour / week / month etc.	RMB 1900 per month		
Please indicate the breakdown of workforce per earnings	0.0% of workforce earning under minimum wage 100.0% of workforce earning minimum wage 0.0% of workforce earning above minimum wage		
Bonus Scheme found: Please specify details:	Bonus Scheme found: Could not be verified due to lack of attendance records and payroll records/inadequate attendance records.  Partial follow up audit on 7-Sep-2023 Full-time bonus and position bonus Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.		
What deductions are required by law e.g. social insurance? Please state all types:	Could not be verified due to lack of attendance records and payroll records/inadequate attendance records.  Partial follow up audit on 7-Sep-2023 Social insurance and personal tax. etc.		
Have these deductions been made?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

Please list all deductions that have been made.	Could not be verified due to lack of attendance records and payroll records/inadequate attendance records.  Partial follow up audit on 7-Sep-2023 Social insurance and personal tax.
Please list all deductions that have not been made.	Could not be verified due to lack of attendance records and payroll records/inadequate attendance records.  Partial follow up audit on 7-Sep-2023 Nil
Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Could not be verified due to lack of attendance records and payroll records/inadequate attendance records.  Partial follow up audit on 7-Sep-2023 Confirmed by document review.
Is there a defined living wage: This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Please give details:
If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation <input type="checkbox"/> Other – please give details:
Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Partial follow up audit on 7-Sep-2023 The factory reviewed it by month, and required the workers to sign the payroll records by month.
Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Please give details:  Partial follow up audit on 7-Sep-2023 Confirmed by document review and employee interview.
How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer <input type="checkbox"/> Other

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Root cause - Other																																							
Local law issue	Payment of Wages Tentative Provisions (1994), Article 6																																						
ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.																																						
Explanation to the non compliance	The payroll records were not signed by workers.工资表员工未签字。																																						
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit																																						
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Additional comments	We will require the employee to sign the payroll record to confirm that it is correct. 我们将要求员工在工资记录上签字确认无误 Partial follow up audit on 7-Sep-2023 Closed Based on document review, the workers signed the payroll records as requirements.																																						



## 6 - Working Hours are not Excessive [Summary of Findings]

### 6: Compliance Requirements

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

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

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

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

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

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

## Current Systems and Evidence Examined

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

### Current Systems:

1. Through employees' interview, overtime is voluntary.

2. Electronic attendance machine is used for time recording (finger printing and face detecting) in the factory, and the factory only provided 6 months attendance records for review.

3. According to interview basic working hours were 8 hours per day and 40 hours per week.

4. One shift was arranged from 8:00~12:00, 13:30~17:30.

5. Whether the factory ensure workers' overtime working hours and weekly working hours in line with legal requirement could not be verified.

6. Whether workers enjoy one day rest within a seven days period could not be verified.

### Partial follow up audit on 7-Sep-2023

The factory provided the attendance records from June 2023 to the audit day and provided the payroll records from June 2023 to July 2023 for review during the audit.

The factory required the workers to punch in and out according to the actual working hours strictly. And related bank transfer records were provided for review.

Some knitting workers worked in two shifts(day shift: 08:00-12:00,13:30-17:30, night shift: 19:30-23:30, 01:00-05:00).

The maximum weekly working hours were 56 hours.

All workers enjoyed one day off after six days.

The monthly overtime hours of 10 out of 10 randomly selected workers exceeded 36 hours in July 2023 with the highest of 76 hours; 10 out of 10 exceeded 36 hours in March 2023 with the highest of 66 hours.

Remark: About the "ZAF600155818" issue whether the workers enjoyed one day off after six days couldn't be verified. Based on the attendance records provided by the factory and workers interview, all workers enjoyed one day off after six days, the maximum continuous working days were 6 days. Due to the sedex system couldn't be revised after submitting, the auditor filled incorrect corrective actions, but there was no way to make changes. The correct comment should be "All workers enjoyed one day off after six days, the maximum continuous working days were 6 days."

### Evidence examined:

Employee interview  
Management interview  
Daily production records  
Leave & resignation records

### Any other comments:

Nil

Working hours' analysis			
<b>Systems &amp; Processes</b>			
What timekeeping systems are used?	Electronic attendance machine (finger printing and face detecting)		
Is sample size same as in wages section?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:		
Are standard/contracted working hours defined in all contracts/employment agreements? (If no, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Are there any other types of contracts/employment agreements used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week? (If yes, please detail hours, %, types of workers affected and frequency.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	<input checked="" type="checkbox"/> 1 in 7 days	<input type="checkbox"/> 2 in 14 days	<input type="checkbox"/> No (please explain)
Is this allowed by local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Maximum number of days worked without a day off (in sample):	6		
<b>Standard/Contracted Hours worked</b>			
Were standard working hours over 48 hours per week found? (If yes, % of workers & frequency)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No % of workers: null% Frequency:		
Any local waivers/local law or permissions which allow averaging/annualised hours for this site? (If yes, please give details.)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
<b>Overtime Hours worked</b>			
Actual overtime hours worked in sample (State per day/week/month)	Could not be verified.  Partial follow up audit on 7-Sep-2023 2 hours per day, 16 hours per week, 76 hours/month in July 2023(Current) 2 hours per day, 16 hours per week, 66 hours/month in June 2023(Random)		
Combined hours (standard or contracted + overtime hours = total) over 60 found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Could not be verified. Partial follow up audit on 7-Sep-2023 The maximum weekly working hours were 56 hours.		
Approximate percentage of total workers on highest overtime hours:	100.0%		



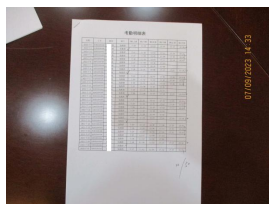
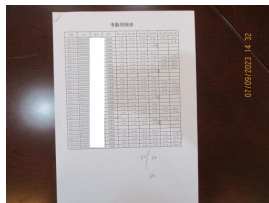
Is overtime voluntary? (Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information  Please give details: The Through employees' interview and documentation review, it was confirmed that overtime was voluntary.		
<b>Overtime premium</b>			
Are the correct legal overtime premiums paid? (Please give details of normal day overtime premium as a % of standard wages)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium  Please give details: Could not be verified.  Partial follow up audit on 7-Sep-2023 150%, 200%, and 300% of normal rate for work on standard days, rest days and statutory holidays respectively.		
Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Partial follow up audit on 7-Sep-2023 150%, 200%, and 300% of normal rate for work on standard days, rest days and statutory holidays respectively.		
If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay <input type="checkbox"/> Collective Bargaining agreements  <input checked="" type="checkbox"/> Other		
Please give details	N/A Partial follow up audit on 7-Sep-2023 150%, 200%, and 300% of normal rate for work on standard days, rest days and statutory holidays respectively.		
If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant. (Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other)	<input type="checkbox"/> Overtime is voluntary  <input type="checkbox"/> Site can demonstrate exceptional circumstances	<input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week is voluntary  <input checked="" type="checkbox"/> Other reasons (please specify)	<input type="checkbox"/> Safeguards are in place to protect worker's health and safety
Please give details	N/A		
Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other	N/A		
Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The production order was busy and this was reviewed through production record and interviews with management and workers.		
If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		

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## 7 - No Discrimination is Practiced

### [Summary of Findings]

#### 7: Compliance Requirements

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

### Current Systems and Evidence Examined

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

#### Current Systems:

1. No employee was required to do the examination of the hepatitis B virus and HIV.
2. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
3. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
4. There was no evidence of sexual harassment.

#### Evidence examined:

Details:  
Payrolls  
Attendance records  
Termination records  
Training records

#### Any other comments:

Nil

Gender breakdown of Management + Supervisors (Include as one combined group)	Male: 60.0%	Female: 40.0%
Number of women who are in skilled or technical roles (e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst)	Nil	
Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?	<div><input type="checkbox"/> Hiring</div> <div><input type="checkbox"/> Promotion</div> <div><input type="checkbox"/> Compensation</div> <div><input type="checkbox"/> Termination or retirement</div> <div><input type="checkbox"/> Access to training</div> <div><input checked="" type="checkbox"/> No evidence of discrimination found</div>	
Please give details	There was no evidence on any form of discrimination found in the factory. This was confirmed during workers' interview.	
Professional Development		
What type of training and development are available for workers?	On-going training is available to enable workers to progress. E.g. machine safety training, first aider training, PPE training, working hours & wages requirements training etc. An equal and clear fair selection standard is in place for all promotions and benefits.	
Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria? (If no, please provide details)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	





## 8 - Regular Employment Is Provided

### [Summary of Findings]

#### 8: Compliance Requirements

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

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

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.

8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour. The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

8.5 Employment agencies must only supply workers registered with them.

8.6 Workers pay no recruitment fee at any stage of the recruitment process.

8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

## Current Systems and Evidence Examined

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

### Current Systems:

1. All workers were employed by the factory directly and the factory had signed labour contracts with workers in the factory. The copies of the labour contracts were provided to workers.
2. No home worker was identified during the audit.
3. Workers were not required to pay any fees at any stage of the hiring process.

### Evidence examined:

#### Details:

The hiring and termination practices

Personal files

Payroll records were provided for review.

### Any other comments:

Nil

## Responsible Recruitment

### All Workers

Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?

- ☒ Terms & Conditions presented ☒ Understood by workers
- ☒ Same as actual conditions

Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement? (If yes, please describe details and specific category(ies) of workers affected)

- ☐ Yes ☒ No

### Migrant Workers

Type of work undertaken by migrant workers:

They worked all types of work in the facility, such as management, technician, and operator.

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

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### 8A - Sub-Contracting and Homeworking [Summary of Findings]

#### 8A: Compliance Requirements

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

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

### Current Systems and Evidence Examined

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#### Current Systems:

No subcontractor was used by the factory.  
No home workers used by the factory.

#### Evidence examined:

N/A

#### Any other comments:

Nil

### Summary of sub-contracting – if applicable

Is there any sub-contracting at this site? ☐ Yes ☒ No

### Summary of homeworking – if applicable

Is homeworking used at this site? ☐ Yes ☒ No

**9 - No Harsh or Inhumane Treatment is Allowed**  
**[Summary of Findings]**

**9: Compliance Requirements**

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

9.2 companies should provide access to a confidential grievance mechanism for all workers

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. The factory has established anti-harsh or inhumane treatment policy.
2. The anti-harsh or inhumane treatment policy and disciplinary procedure were communicated to the employees through regular trainings.
3. Employee interview confirmed that employees were aware of anti-harsh or inhumane treatment and disciplinary conditions.

**Evidence examined:**

**Details:**

Factory tour

Management interview and employee interview

**Any other comments:**

Nil

Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?

☒ Yes ☐ No

Please give details:

The factory provided access to a confidential grievance mechanism for all workers.

If yes, are workers aware of these channels and have access? Please give details.

All employees were trained on the facility confidential grievance mechanism.

If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.

Suggestion box and employees can also report to their supervisor directly.

Which of the following groups is there a grievance mechanism in place for?

☒ Worker ☐ Communities  
☐ Suppliers ☐ Other

Please provide grievance mechanism details

The grievance mechanism includes a provision for non-retaliation and it allows workers to report issues anonymously.

Are there any open disputes?

☐ Yes ☒ No

Please give details:

Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)

☒ Yes ☐ No

Please give details:

Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details:
Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details:



**10A - Entitlement to Work and Immigration**  
**[Summary of Findings]**

**10A: Compliance Requirements**

10.A.1 Only workers with a legal right to work shall be employed or used by the supplier.

10.A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

**Current Systems and Evidence Examined**

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

**Current Systems:**

1. The factory would review the workers' original documents during the recruitment.
2. No employment agency was used by the factory. The factory recruited the new workers by the advertisements or the employees' recommendation
3. No foreign employee was used by the facility.

**Evidence examined:**

Details:  
Hiring procedure  
Personnel files

**Any other comments:**

Nil

**10B2 - Environment 2-Pillar**  
**[Summary of Findings]**

**10B2: Compliance Requirements**

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

10.B2.2 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 factory did not conduct boundary noise monitoring and did not provide the report for review.
2. There were no hazardous wastes in the factory. Only machine oil was used for sewing machines.

Partial follow up audit on 7-Sep-2023

The factory conducted boundary noise monitoring on August 17,2023, the result was acceptable.

**Evidence examined:**

**Details:**

Management interview  
Document review  
Factory tour

**Any other comments:**

Nil

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## Attachments



[R-Cloud-23168012-Audit Photos.pdf](#)



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

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