

# Test Report

Report No.: AGC02453191001-001

Date: Oct.31, 2019

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Applicant:

Address:

Test site: 1,6/F.,Building 2,No.1-4, Chaxi Sanwei Technical Industrial Park, Gushu, Xixiang, Baoan District, Shenzhen, Guangdong, China

## Report on the submitted samples said to be:

Sample Name : Rubbered ballpen in metal case  
Model No. : TB102+39317  
Item No. : 9183  
Country of Origin : CHINA  
Country of Destination : EUROPE  
Sample Receiving Date : Oct.21, 2019  
Testing Period : Oct.21, 2019 to Oct.31, 2019

Test Requested: : Please refer to next page(s).

Test Method : Please refer to next page(s).

Test Result : Please refer to next page(s).

Approved by:

Liulinwen, Lewis

Technical Director



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## Test Requested:

1. As specified by client, to determine the Cadmium(Cd)content in the submitted sample(s) with reference to entry 23, Annex XVII of the REACH Regulation (EC) No 1907/2006.
2. As specified by client, to determine the Polycyclic Aromatic Hydrocarbons (PAHs) content in the submitted sample(s) with reference to entry 50, Annex XVII of the REACH Regulation (EC) No 1907/2006.
3. As specified by client, to determine the phthalates content in the submitted sample(s) with reference to entry 51 and its amendment (EU)2018/2005& entry 52, Annex XVII of the REACH Regulation (EC) No 1907/2006 and Amendment Regulation (EC) No 552/2009.
4. As specified by client, to determine the nickel release in the submitted sample(s) with reference to entry 27, Annex XVII of the REACH Regulation (EC) No 1907/2006 .
5. As specified by client, to determine Lead(Pb), Cadmium(Cd), Mercury(Hg) , Hexavalent Chromium (Cr<sup>6+</sup>) content in the submitted sample accordance with European Parliament and Council Directive 94/62/EC and Amendment Regulation 2013/2/EU on packaging and packaging waste.

## Conclusion

Pass

Pass

Pass

Pass

Pass

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**AGC**

Attestation of Global Compliance Std. & Tech.

**No.18 C**

Tel: +86-755 8358 3833 Fax: +86-755 2531 6612 E-mail: agc01@agc-cert.com 400 089 2118  
Add: Building 2, No.171, Meihua Road, Shangmeilin, Futian District, Shenzhen, Guangdong China

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**Test Result(s):**
**1. Test Result(s) of Cd content**

Unit: mg/kg

Test item(s)	Test Method/ Equipment	MDL	Result(s)				Limit
			1-3	1-4	1-5	1-6	
<b>Cadmium (Cd)</b>	IEC 62321-5:2013	10	N.D.	N.D.	N.D.	N.D.	100
<b>Conclusion</b>	ICP-OES	/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	/

Unit: mg/kg

Test item(s)	Test Method/ Equipment	MDL	Result(s)				Limit
			1-7	1-8	1-9	1-10	
<b>Cadmium (Cd)</b>	IEC 62321-5:2013	10	N.D.	N.D.	N.D.	N.D.	100
<b>Conclusion</b>	ICP-OES	/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	/

Unit: mg/kg

Test item(s)	Test Method/ Equipment	MDL	Result(s)			Limit
			1-11	1-12	1-13	
<b>Cadmium (Cd)</b>	IEC 62321-5:2013	10	N.D.	N.D.	N.D.	100
<b>Conclusion</b>	ICP-OES	/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	/

- Note:**
1. MDL=Method Detection Limit
  2. N.D.=Not Detected(less than method detection limit)
  3. As specified by client, only test the designated sample

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**2. Test Result(s) of Polycyclic Aromatic Hydrocarbons (PAHs)**

Unit: mg/kg

Test Item(s)	Test Method /Equipment	MDL	Result(s)			Limit
			1-2	1-5	1-11	
Benzo[a]anthracene (BaA)	AfPS GS 2014:01 PAK GC-MS	0.1	N.D.	N.D.	N.D.	1
Chrysene (CHR)		0.1	N.D.	N.D.	N.D.	1
Benzo[b]fluoranthene (BbFA)		0.1	N.D.	N.D.	N.D.	1
Benzo[k]fluoranthene (BkFA)		0.1	N.D.	N.D.	N.D.	1
Benzo[j]fluoranthene (BjFA)		0.1	N.D.	N.D.	N.D.	1
Benzo[a]pyrene (BaP)		0.1	N.D.	N.D.	N.D.	1
Benzo[e]pyrene(BeP)		0.1	N.D.	N.D.	N.D.	1
Dibenzo[a,h]anthracene (DBAhA)		0.1	N.D.	N.D.	N.D.	1
<b>Sum of 8 PAHs</b>		—	N.D.	N.D.	N.D.	—
<b>Conclusion</b>		/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	/

- Note:**
1. MDL=Method Detection Limit
  2. N.D.=Not Detected(less than method detection limit)
  3. “—”=Not regulated
  4. As specified by client, only test the designated sample.

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**3. Test Result(s) of phthalates content**

Unit: %, w/w

Test Item(s)	Test Method/ Equipment	MDL	Result(s)			Limit
			1-2	1-5	1-11	
Dibutyl phthalate (DBP)	EN 14372:2004 GC-MS	0.01	N.D.	N.D.	N.D.	0.1
Butylbenzyl phthalate (BBP)		0.01	N.D.	N.D.	N.D.	0.1
Di- (2-ethylhexyl) phthalate (DEHP)		0.01	N.D.	N.D.	N.D.	0.1
Diisobutyl phthalate (DIBP)		0.01	N.D.	N.D.	N.D.	0.1
<b>Sum of DBP+BBP+DEHP+DIBP</b>		—	N.D.	N.D.	N.D.	0.1
Di-n-octyl phthalate (DNOP)		0.01	N.D.	N.D.	N.D.	-
Di-isononyl phthalate (DINP)		0.01	N.D.	N.D.	N.D.	
Di-isodecyl phthalate (DIDP)		0.01	N.D.	N.D.	N.D.	
<b>Sum of DNOP+DINP+DIDP</b>		—	N.D.	N.D.	N.D.	0.1
<b>Conclusion</b>			/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>

- Note:**
- 0.1%,w/w =1000mg/kg
  - MDL=method detection limit
  - N.D.=not detected (less than method detection limit)
  - “—”=Not regulated
  - As specified by client, only test the designated sample

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**4. Test Result(s) of Nickel (Ni) release**

 Unit:  $\mu\text{g}/\text{cm}^2/\text{week}$ 

Test Item(s)	Test Method/equipment	MDL	Result(s)		
			1-4-A	1-4-B	1-4-C
Nickel (Ni) release	EN 12472:2005+A1:2009 EN 1811:2011+A1:2015	0.05	N.D.	N.D.	N.D.
<b>Conclusion</b>	ICP-OES	/	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>

Type of sample	Nickel release ( $\mu\text{g}/\text{cm}^2/\text{week}$ )	
	Pass	Fail
Article with Nickel release limit of $0.5\mu\text{g}/\text{cm}^2/\text{week}$ (Non-body piercing)	< 0.88	$\geq 0.88$
Article with Nickel release limit of $0.2\mu\text{g}/\text{cm}^2/\text{week}$ (Body piercing)	< 0.35	$\geq 0.35$

**Note:**

1. N.D.=not detected (<MDL)
2. MDL=Method Detection Limit
3.  $\mu\text{g}/\text{cm}^2/\text{week}$  = microgram per square centimeter per week
4. As specified by client, only test the designated sample.

**5. Test Result(s) of Pb, Cd, Hg, Cr<sup>6+</sup> content**

Unit: mg/kg

Test item(s)	Test Method/ Equipment	MDL	Result(s)		Limit
			1-1	1-2	
Lead (Pb)	IEC 62321-5:2013 ICP-OES	5	18	N.D.	—
Cadmium (Cd)		5	N.D.	N.D.	—
Mercury (Hg)	IEC 62321-4:2013+A1:2017 ICP-OES	5	N.D.	N.D.	—
Hexavalent Chromium (Cr <sup>6+</sup> )	IEC 62321-7-2:2017 UV-Vis	1	/	N.D.	—
	IEC 62321-7-1:2015 UV-Vis	See note	Negative	/	#
Sum of (Pb + Cd + Cr <sup>6+</sup> + Hg)	/	/	18	N.D.	100
<b>Conclusion</b>	/	/	<b>Pass</b>	<b>Pass</b>	/

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**Note:**

- mg/kg =parts per million
- N.D.=Not Detected(less than method detection limit)
- MDL = Method Detection Limit
- “—” =Not regulated
- Negative = Absence of Cr(VI) on the tested areas
- Boiling-water-extraction:

Number	Colorimetric result (Cr(VI) concentration)	Qualitative result
1	The sample solution is <math>< 0,10 \mu\text{g}/\text{cm}^2</math> equivalent comparison standard solution	The sample is negative for Cr(VI) – The Cr(VI) concentration is below the limit of quantification. The coating is considered a non-Cr(VI) based coating.
2	The sample solution is $\geq$ the $0,10 \mu\text{g}/\text{cm}^2$ and $\leq$ the $0,13 \mu\text{g}/\text{cm}^2$ equivalent comparison standard solutions	The result is considered to be inconclusive – Unavoidable coating variations may influence the determination.
3	The sample solution is $>$ the $0,13 \mu\text{g}/\text{cm}^2$ equivalent comparison standard solution	The sample is positive for Cr(VI) – The Cr(VI) concentration is above the limit of quantification and the statistical margin of error. The sample coating is considered to contain Cr(VI).

- # =Negative indicates the absence of Cr(VI) on the tested areas concentration is below the limit of quantification. The coating is considered a non-Cr(VI) based coating.  
 Uncertainty indicates the absence of Cr(VI) on the tested areas unavoidable coating variations may influence the determination.  
 Positive indicates the presence of Cr(VI) on the tested areas concentration is above the limit of quantification and the statistical margin of error. The sample coating is considered to contain Cr(VI).  
 Storage conditions and production date of the tested sample are unavailable and thus result of Cr(VI) represent status of the sample at the time of testing.
- As specified by client, only test the designated sample.

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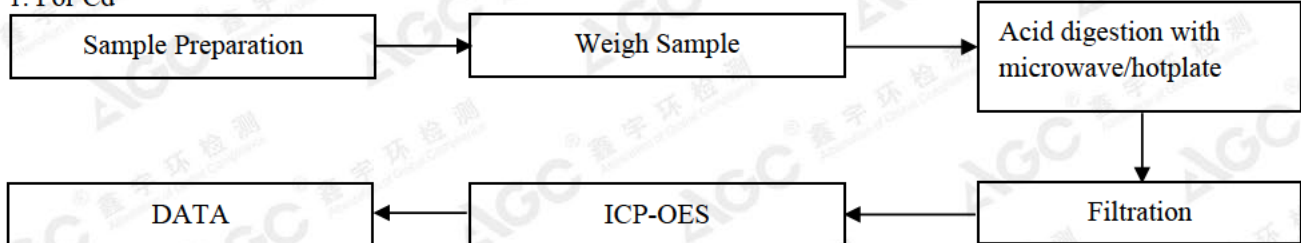
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## Sample Description

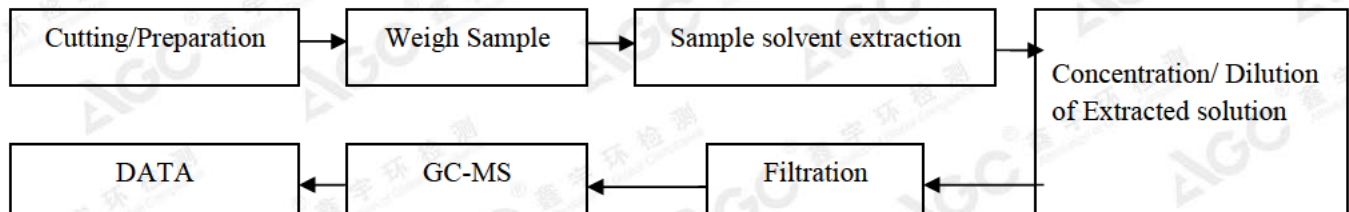
1-1	Metal case
1-2	Black EVA
1-3	Silver plating
1-4	Metal clip
1-5	White plastic
1-6	Black rubber coating
1-7	Grey rubber coating
1-8	Blue rubber coating
1-9	Red rubber coating
1-10	Aluminum tube
1-11	Black rubber rolling ball
1-12	Spring
1-13	White pen tube(inside)

## Test Flow Chart

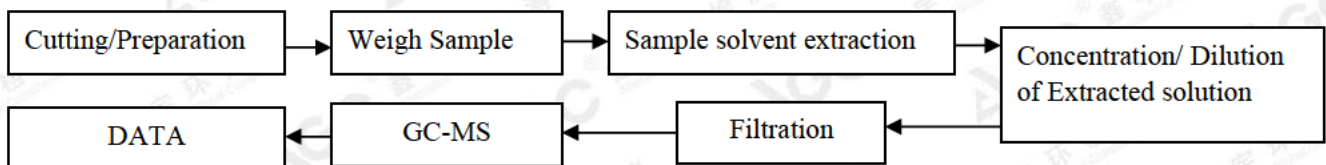
### 1. For Cd



### 2. For PAHs



### 3. For phthalates



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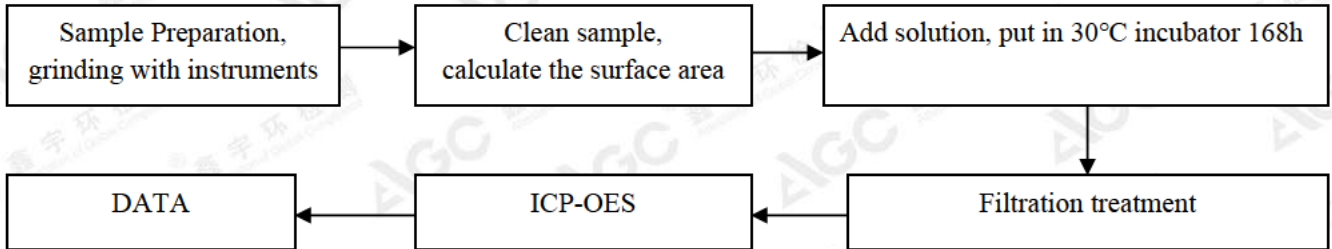
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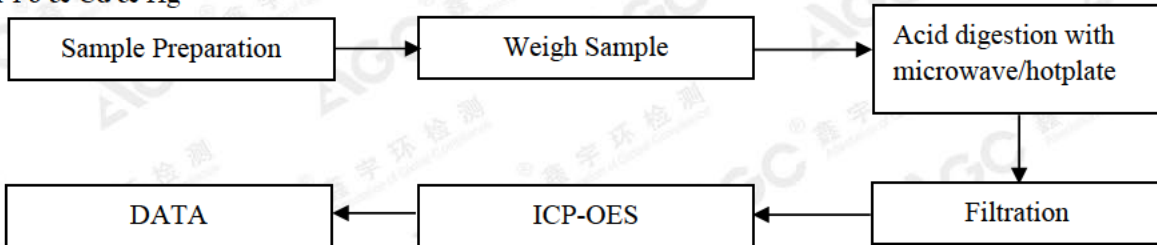
Date: Oct.31, 2019

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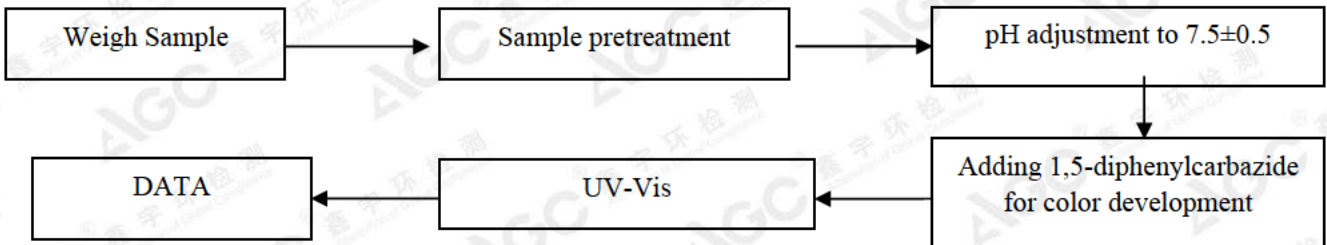
4. For Ni release



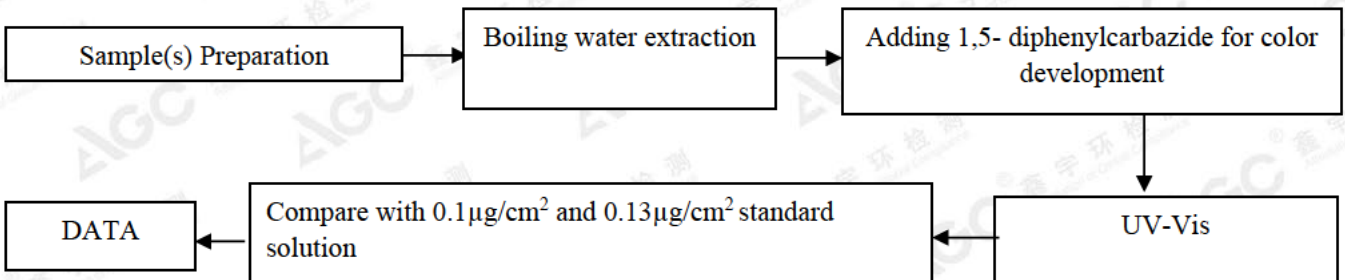
5. For Pb & Cd & Hg



6. For non-metal Cr(VI)



7. For metal Cr(VI)



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## The photo of the sample



**AGC02453191001-001**

AGC authenticate the photo on original report only

\*\*\* End of Report\*\*\*

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Auditee :	[redacted]
Audit Date From :	26/08/2020
Audit Date To :	26/08/2020
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	ALGI
Auditor's Name(s) :	John He(Lead)
Auditing Branch (if applicable) :	ALGI China



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.  
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Rating Definitions

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

**Main Auditee Information**



Name of producer :	[REDACTED]		
DBID number :	[REDACTED]		
Audit ID :	[REDACTED]		
Address :	[REDACTED]		
Province :	Zhejiang	Country :	China
Management Representative :	Mr. Jiahao Huang / Production supervisor		
Contact person:	Jiahao Huang	Sector :	Non-Food
Industry Type :	Accessories	Product group :	other accessories (please specify)
Product Type :	Automatic pencil, ball pen, neutral pen, marking pen		



**Audit Details**

Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural <input type="checkbox"/> Small Producer
Audit Announcement :	<input type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced <input checked="" type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No	
Audit extent (if applicable) :	none	
Audit interferences or contingencies (if applicable) :	none	
Overall rating :	C	
Need of follow-up :	Yes	If YES, by : 26/08/2021

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

**Executive summary of audit report**

[redacted] (Local Name: 余姚市文博制笔有限公司, Uniform Code of Social Credit: 91330281732136448K) was located at No.171-2, Yingfeng Road, Linshan, Yuyao, Ningbo City, Zhejiang Province, China (中国浙江省宁波市余姚市临山镇迎凤路171-2号). The auditee was established in 2001 and specializes in manufacture of pen, main production processes included mould processing, mixing, smashing, injecting, inspecting, assembling and packing. Only production process of painting was sub-contracted.

The auditee consisted of one 3-storey office building as offices and production areas, one 2-storey production building as production areas and one 1-storey warehouse building as warehouses. On the audit day, there were total 48 workers in the auditee, of which 38 workers were production workers. As per management interview, peak season was not obvious per year.

From documents review and management interview, it was noted that all workers in the auditee were paid by hourly rate in cash around 30 h per month. The factory used fingerprint machine to record all workers' working hours, the regular working hours for all workers were from 08:00 to 17:00 with 1 hour of lunch break from 11:30 to 12:30, normal working days were from Monday to Friday, overtime working was usually arranged for 2 hours on weekdays and for 8 hours on Saturdays, never OT on Sundays and public holidays.

During this audit, the auditee provided the attendance records from Jul.1, 2019 to the audit date and payrolls from Jul.2019 to Jun.2020, the workers' monthly OT hours exceeded 36 hours for the law limit and maximum monthly OT hours reached to 50 hours in Dec.2019, and it was noted that the monthly overtime hours of 5 out of 5 sampled workers were 44 hours in Jul.2020(Unpaid month), the monthly overtime hours of 5 out of 5 sampled workers were 42 hours in Jun.2020(current month), the monthly overtime hours of 5 out of 5 sampled workers were 50 hours in Dec.2019(random month), and monthly overtime hours of 5 out of 5 sampled workers were 48 hours in Aug.2019(random month).

Remark:

- The local legal minimum wage standard was RMB1800 per month or RMB10.34 per hour since Dec 1, 2017.
- The auditee did not understand what living wage is, and did not calculate local living wage. The auditor used ALGI's calculated basic living wage RMB 4330.34 which was based on the data from the local government, all sampled workers' wages (RMB 2793-3529 per month) were less than the basic living wage.
- No agency labour contract, government waiver or collective bargaining agreement was attached in the report for there was no agency, waiver or collective bargaining agreements in the factory.
- The audit was conducted on Aug.26, 2020 by ALGI auditor Mr. John He(lead auditor) - APSCA registration No. RA 21701856.
- From onsite observation, rent contract review and management interview, there were total 5 main buildings in the plant, the auditee used one 3-storey office building, one 2-storey production building and one 1-storey warehouse building as offices and production areas; Other 2 buildings as offices, canteen and production areas were rented to another factory named Ningbo Shifeng Stationery and Gift Co., Ltd. Meanwhile, auditor toured onsite and factory management stated the legal representative of the auditee was different from another factory, 2 factories had independent management and workers, attendance systems, no workers were exchanged for 2 factories, so the rented areas were excluded from the audit scope during the audit.
- The auditee did not provide dormitory, canteen/kitchen and regular bus to the workers.



**Ratings Summary**



Auditee's background information			
Auditee's name :	[redacted]	Legal status :	Limited Company
Local Name :	[redacted]	Year in which the auditee was founded :	2001
Address :	[redacted]	Contact person (please select) :	Jiahao Huang
Province :	[redacted]	Contact's Email :	[redacted]
City :	[redacted]	Auditee's official language(s) for written communications :	Chinese
Region :	[redacted]	Other relevant languages for the auditee :	Nil
Country :	China	Website of auditee (if applicable) :	None
GPS coordinates :	[redacted]	Total turnover (in Euros) :	[redacted]
Sector :	Non-Food	Of which exports % :	[redacted]
Industry :	Accessories	Of which domestic market % :	[redacted]
If other, please specify :	NA	Production volume :	[redacted]
Product Group :	other accessories (please specify)	Production cost calculation :	Yes
If other, please specify :	Stationery	Lost time injury calculation cost :	No
Product Type :	Automatic pencil, ball pen, neutral pen, marking pen		

Auditee's employment structure at the time of the audit			
Total number of workers :	48	Total number of workers in the production unit to be monitored (if applicable) :	0
		<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>
Permanent workers		12	36
Temporary workers		0	0
In management positions		4	0
Apprentices		0	0
On probation		0	0
With disabilities		0	0
Migrants (national citizens)		1	7
Migrants (foreign citizens)		0	0
Workers on the permanent payroll		12	36
Production based workers		5	33
With shifts at night		0	0
Unionised		0	0
Pregnant		-	0
On maternity leave		-	0

**Finding Report**



**Performance Area 1 : Social Management System and Cascade Effect**

Full Audit [Audit Id - [redacted]] Audit Date: 26/08/2020 PA Score: D

Deadline date:25/08/2021

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee formulated the management system to implement most of requirements of Amfori BSCI code of conduct, nominated Production supervisor/Mr. Huang who had a general understanding of social compliance requirements, in order to the establishment, implementation and maintenance of Amfori BSCI system, arranged the regular trainings regarding Amfori BSCI Code and social responsibility, done the daily fire and facilities inspections, monitored the performance of significant business partners and saved the assessment records. However, gaps had been identified in implementation:

整体观察显示, 被审核方目前部分履行对该区域的要求。被审核方建立了管理体系并确保他们遵守了Amfori BSCI行为准则大部分要求, 指定了对社会责任要求比较了解的生产主管/黄先生负责Amfori BSCI系统的建立, 实施和维护, 定期安排了有关人员关于社会责任和Amfori BSCI要求培训, 进行了日常的消防和设施检查, 且对商业合作伙伴的表现进行了调查和监管, 保留了评估记录。然而, 在实际执行过程中仍然存在问题:

- 1.1 - The written management procedures were enacted by the auditee and Production Supervisor as Management representative was assigned to implement Amfori BSCI management system, but not all policies were carried out well, these findings in PA2 (Workers Involvement and Protection), PA5 (Fair Remuneration), PA6 (Decent Working Hours), PA7 (Occupational Health and Safety) and PA12 (Protection of the Environment) were noted during the audit.

被审核方制定了书面的管理程序并指定生产主管作为管理者代表推行Amfori BSCI管理体系, 但本次审核发现不是所有政策都有效实施, 发现PA2 (工人参与和保护), PA5 (公平报酬), PA6 (体面劳动时间), PA7 (职业健康与安全) 和PA12 (保护环境) 仍存在问题。

- 1.4 - The auditee formulated the procedures on production capacity planning and cost accounting, factory management stated that all goods could be finished on time to meet the requirements of the delivery, but did not provide satisfactory evidence of workforce capacity assessment, which was properly organized to meet the expectations of the delivery order and contracts, which led to monthly OT hours beyond 36 hours in past months.

被审核方制定了产能评估和成本计算程序, 管理层表示所有货物都能准时完成, 持续满足交货期要求, 但未提供有效证据证明对产能、劳动力资源是否满足订单及合同要求的评估, 导致过去月份加班超36小时的情况。

**Remarks from Auditee:**

Nil

**Performance Area 2 : Workers Involvement and Protection**

Full Audit [Audit Id - [redacted]] Audit Date: 26/08/2020 PA Score: B

Deadline date:25/08/2021

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. Amfori BSCI Code of Conduct was collected and posted in the notice board for learning by the auditee, the auditee formulated the training policy and plans, arranged all kinds of trainings regarding human rights and Amfori BSCI Code as well as social responsibility to all workers, management and most of 5 interviewed workers had the awareness. For grievance mechanism, Production supervisor was required to implement the system and he collected the suggestion records per month, it showed that the workers were satisfied with the auditee, no any grievance was collected. However, gaps had been identified in implementation:

整体观察显示, 被审核方目前部分履行对该区域的要求。被审核方收集并现场张贴了Amfori BSCI行为准则供学习, 也制定了培训政策和培训计划, 提供了一系列的培训(关于人权, Amfori BSCI行为准则和社会责任)给所有工人, 管理层和5名访谈的大部分工人均有意识。对于申诉机制, 生产主管负责运行, 他每月收集工人的意见记录, 记录显示工人满意工厂的管理, 无任何抱怨或投诉。然而, 在实际执行过程中仍然存在问题:

- 2.2 - Auditor reviewed the long-term goals and interviewed with management representative, the auditee set up the long-term goals for Amfori BSCI 13 PAs including completed PAs and ZT checkpoints, which was not in line with Amfori BSCI requirements.

审核员查看了长期目标并与管理者代表交流, 被审核方针对Amfori BSCI 13 PAs包括已经完成的PAs和ZT点设定了长期目标, 不满足Amfori BSCI要求。

- 2.5 - Auditor reviewed the grievance procedure and interviewed with Production supervisor Assistant, he was appointed to manage the grievance mechanism and collected the suggestion records per month, the interviewed workers were satisfying, but 60% workers did not know the complaint channels included 2 workers representatives and their responsibilities clearly.



审核员查阅了申诉程序并与生产主管交流, 他被指定负责申诉机制运行, 且每月收集工人的意见, 访谈工人均满意工厂管理, 但60%工人不清楚知道申诉渠道包括2名工人代表和工人代表职责。

**Remarks from Auditee:**

Nil





Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
Full Audit [Audit Id -  Audit Date: 26/08/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. Per program and records review, onsite observation and interviews, the auditee had fully developed the system regarding the Rights of Freedom of Association and Collective Bargaining, all workers had own rights to voice the opinions, no any negative evidence was found during this audit. In addition, the auditee held the regular meeting with workers representatives to discuss the daily affairs, the meeting minutes were provided for review, the latest time was arranged on Jun.10, 2020 and focus on fire passageways. 未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。从程序和记录查看，现场观察和访谈，被审核方已经建立了结社自由与集体谈判权体系，所有工人均有自己的权力去发表意见，本次审核未有负面证据。此外，被审核方定期与工人代表举行会议讨论日常事务，会议记录提供查看，最近一次安排在2020年6月10日，焦点在消防通道。	
<b>Remarks from Auditee:</b> NA	
Performance Area 4 : No Discrimination	
Full Audit [Audit Id -  Audit Date: 26/08/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. The auditee formulated the policy regarding to anti-discrimination, this policy was defined that the auditee did not discriminate workers by race, gender and ages, etc.. Auditor toured onsite and interviews, the local workers did not discriminate the immigrant workers, high wages workers did not discriminate the low wages workers, office staffs did not discriminate the production workers, management did not discriminate the production workers, men and women were not discriminated each other, the workers from different provinces were not discriminated each other. In addition, the auditee would conduct the assessment on discrimination by internal audit or regular assessment to take effective measures avoiding or eradicating discrimination practices at workplaces in the future. 未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。被审核方制定了关于反歧视政策，该政策表明被审核方不会因为种族，性别，年龄等原因对工人区别对待。审核员走访了现场并进行了访谈，当地人不会歧视外地人，高工资工人不会歧视低工资工人，办公人员不会歧视生产工人，管理层不会歧视生产工人，男女工人不会相互歧视，不同省份的工人不会相互歧视。此外，被审核方也将通过定期评估或内审对工作场所是否发生歧视现象进行评估，并采取有效的措施来避免或根除已发生的歧视现象。	
<b>Remarks from Auditee:</b> NA	

**Performance Area 5 : Fair Remuneration**

Full Audit [Audit Id - [redacted]] Audit Date: 26/08/2020 PA Score: C

Deadline date:25/08/2021

**GOOD PRACTICES:**

The workers' minimum wages were paid at least RMB2100/mon h since Jul.2019, which exceeded the local law requirements. 工厂自2019年7月起支付工人最低工资至少RMB2100/月, 超过当地法规要求。

**AREAS OF IMPROVEMENT:**

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee respected the workers rights of getting fair remuneration, the workers wages were differed according to workers' skills and education and etc.. Auditor reviewed the required payrolls from Jul.2019 to Jun.2020, all the workers were guaranteed with minimum wages and the wages per month were paid timely, he payable wages including the wages for annual leaves were paid as per he law requirements, no disciplinary deduction was available, the workers were satisfied with their wages and it could meet their living needs. However, gaps had been identified in implementation:

整体观察显示, 被审核方目前部分履行对该区域的要求。被审核方尊重工人获得公平报酬的权利, 工人工资根据他们的技能及教育程度等方面体现。审核员查阅了从2019年7月到2020年6月要求的工资, 所有工人都保证满足了最低工资标准, 工资每月都会及时发放, 按照法规要求支付了应得到的工资包括年休假工资, 未有纪律性罚款, 工人均满意他们的工资, 能够满足他们的生活需求。然而, 在实际执行过程中仍然存在问题:

- 5.4 - The auditee did understand what living wage is, and did not calculate local living wage, all sampled workers were paid RMB 2793-3529 per mon h, which was less than the local Living Wage. ALGI's calculated basic living wage was RMB 4330.34 which based on the data from the local government.

被审核方不了解生活工资是什么, 没有计算当地生活工资, 所有抽样的员工工资为每个月2793-3529元, 均没有达到当地基本生活需求工资的要求。根据当地政府的数据, ALGI算出的基本生活工资为4330.34元。

- 5.5 - The number for social insurance was insufficient. During the audit, auditor checked he roster, there were total 48 workers included 18 retired workers, he auditee should provide social insurances for 30 workers; Based on social insurance payment invoices from May 2020 to Jul.2020, it was noted that the factory only provided the re iment insurance to 22 workers, medical insurance to 22 workers(73.3%), maternity insurance to 22 workers(73.3%), unemployment insurance to 22 workers(73.3%), injury insurance to 22 workers(73.3%); And the auditee did not provide the business insurances to other all workers. The auditee explained he reason for poor social insurance coverage rate was high turnover rate, 20% workers were not willing to buy the social insurances and hey bought new rural social pension insurance at home, but no valid evidence was proved that these workers bought the new rural social pension insurance. This violated Articles 72 and 73 of the Labor Law of he People's Republic of China.

社会保险缴纳人数不足。本次审核, 审核员核查了花名册, 被审核方共48名工人包括18名退休工人, 应该为30名工人购买社会保险; 根据提供的从2020年5月到2020年7月的社保缴纳记录, 被审核方给22名工人 (73.3%) 购买了养老保险, 生育保险, 失业保险, 医疗保险和工伤保险; 且被审核方未提供其他所有工人商业意外保险。被审核方解释社保不足的原因是工人流动性大, 20%工人表示不愿意购买社会保险且他们有在家购买了新农保, 但未提供有效证据证实这些工人有购买新农保。这违反了《中华人民共和国劳动法》第72和73条。

**Remarks from Auditee:**

Nil

**Performance Area 6 : Decent Working Hours**

Full Audit [Audit Id - [redacted]] Audit Date: 26/08/2020 PA Score: D

Deadline date:25/08/2021

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee established he attendance program on working hours, the requirements for working hours and OT were provided to the workers, the attendance system was on computer and used Fingerprint attendance recorder to record the working hours, all workers punched the attendance recorder per day timely, punched 4 imes or 6 times per day, provided he required attendance records from Jul.1, 2019 to the audit date for review. From interviews, Management reasonably arranged the work and OT from the receiving order to shipment, ensure he workers could enjoy 1 day off per 7 days, had sufficient rest ime, OT wages met the law requirements in past mon hs. However, gaps had been identified in implementation:

整体观察显示, 被审核方目前部分履行对该区域的要求。被审核方建立了考勤管理制度, 关于工时和加班要求提供给工人, 考勤系统建立在电脑上, 使用指纹考勤机记录工人的工作时间, 所有工人均准时打考勤机, 每天4次或6次, 并提供了从2019年7月1日到审核当天的考勤记录查看。结合访谈, 管理层从接单到交货合理安排工作和工人加班, 确保过去月份里工人均能享受七休一, 有足够的休息时间, 加班工资均满足法规要求。然而, 在实际执行过程中仍然存在问题:

- 6.2 - Mon hly OT hours was beyond 36 hours for the law limit. During his audit, auditor verified the provided attendance records from Jul.1, 2019 to he audit date and payrolls from Jul.2019 to Jun.2020, the workers' monthly OT hours exceeded 36 hours for he law limit and maximum monthly OT hours reached to 50 hours in Dec.2019, and it was noted that the monthly overtime hours of 5 out of 5 sampled workers were 44 hours in Jul.2020(Unpaid month), he mon hly overtime hours of 5 out of 5 sampled workers were 42 hours in Jun.2020(current month), the mon hly over ime hours of 5 out of 5 sampled workers were 50 hours in Dec.2019(random mon h), and monthly overtime hours of 5 out of 5 sampled workers were 48 hours in Aug.2019(random month). This violated the PRC Labor Law, Article 41.

月加班时间超出法规36小时要求。本次审核, 审核员核实了从2019年7月1日到审核当天的考勤和从2019年7月到2020年6月工资, 工人月加班超出法规要求且最大达到50时在2019年12月, 发现2020年7月(未发薪月份)5名抽查工人中5名的月加班工时为44小时, 2020年6月(当前月份)5名抽查工人中5名的月加班工时为42小时, 2019年12月(随机月份)5名抽查工人中5名的月加班工时为50小时, 2019年8月(随机月份)5名抽查工人中5名的月加班工时为48小时。这违反了《中华人民共和国劳动法》第41条。

**Remarks from Auditee:**

Nil

**Performance Area 7 : Occupational Health and Safety**

Full Audit [Audit Id - Audit Date: 26/08/2020 PA Score: C

Deadline date:25/08/2021

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee enacted the policy and procedure on health and safety and implement it accordingly, such as Production supervisor/Mr. Huang was appointed to in charge of health and safety issues, health and safety trainings were provided to the workers, provided a safe and hygienic working environment, such as sufficient ventilation, space, temperature and lighting were beneficial to the production processes, the workers could free access to the clean toilets and drinking water. By onsite checking, fire facilities such as fire extinguishers, fire hydrants, fire alarm system, emergency lights and exit signs were installed and maintained monthly, which was in good condition by testing and inspecting during this audit. And there were 2 qualified first aiders in the auditee and sufficient first aid kits were equipped in each workshop, the accident and emergency procedure was posted onsite for guidance. Meanwhile, Production supervisor claimed that all workers had the right to remove themselves from imminent danger without seeking prior permission from the auditee, which was verified by workers interview. However, gaps had been identified in implementation: Remarks: 1. 7.21: The auditee currently did not provide kitchen or canteen to the workers. 2. 7.23: The auditee currently did not provide regular bus to workers.

整体观察显示, 被审核方目前部分履行对该区域的要求。被审核方制定了健康安全政策及程序并按要求执行, 如指定生产主管/黄先生负责健康安全事宜, 定期给工人提供健康安全培训, 提供了一个安全卫生的工作环境, 如充足的通风, 空间, 温度和照明有利于生产, 工人能够自由上厕所和饮水。通过现场核查, 消防设施如灭火器, 消防栓, 消防警铃, 应急灯, 安全出口标等已安装并每月维护, 本次审核通过检查和测试均完好。被审核方培训了2名有资质的急救员且每个车间配备了足够的药箱, 事故应急程序张贴现场给工人需要时提供指引。同时, 生产主管声称所有人有权在遇到危险时可以先逃离危险, 并通过工人访谈进行了确认。然而, 在实际执行过程中仍然存在问题: 备注: 1、7.21: 被审核方目前没有给工人提供餐厅和食堂。2、7.23: 被审核方目前没有给工人提供交通工具。

7.1 - For total PA7, the auditee formulated the occupational health and safety procedures including chemicals, PPEs, electric facilities and equipment, assigned Production supervisor to be responsible for health and safety issues, total management system was operated, but still health and safety issues were noted due to management negligence. Meanwhile, the goods were placed on the sides of the aisles reasonably, but 20% of raw materials and finished products were stored against the walls and the distance was less than 0.5 meter. This violated the Rules Concerning Warehouse Safety and Fire Control, Article 18.

对于整个PA7领域, 被审核方制定了职业健康安全程序文件, 包括化学品, PPEs, 电气设施和设备, 指定生产主管负责健康安全事宜, 整个管理体系在运行, 但由于管理疏忽, 仍有健康问题存在。此外, 货物合理堆放在通道两边, 但发现20%原料和成品靠墙堆放且距离小于0.5米。这违反了《仓库防火安全管理规划》第18条。

7.2 - Auditor reviewed the provided injury records and the roster, no injury case occurred in the workplaces, there were total 48 workers with 18 retired workers in the auditee, but only provided the injury insurances for 22 out of 30 workers and 18 retired workers were not provided the business insurances.

审核员查阅了工伤记录和花名册, 工作场所至今未发生工伤事故, 被审核方共48名工人包括18名退休工人, 只为30名工人中22名购买了工伤保险且18名退休工人未提供商业意外保险。

7.3 - 1. Auditor reviewed the document, the auditee developed the risks assessment system and conducted the risks assessments on occupational health and safety for the posts, occupational disease, young workers, pregnant women and other particularly vulnerable employees, illness, infectious and non-infectious diseases, but did not include the Covid-19. (#Covid-19)

2. Production supervisor did not arrange the occupational health examinations for 5 workers in hazardous posts as per the law requirements. This violated Article 36, Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases. 3. The auditee did not conduct the occupational hazardous factors monitoring for noise and dust at mixing and smashing workshops. This violated Provisions on the Supervision and Administration of Workplace Occupational Health, Article 20.

1. 审核员查看了文件, 被审核方建立了风险评估系统且对生产岗位, 职业病, 未成年工, 孕妇和其他弱势群体, 疾病, 传染病和非传染病进行了安全风险评估, 但未包含2019年新型冠状病毒。(Covid-19)

2. 生产主管未安排5名危害岗位工人进行职业病健康检查。这违反了《中华人民共和国职业病防治法》第36条。3. 被审核方未对拌料和粉碎车间进行职业病危害因素监测(粉尘和噪音)。这违反了《工作场所职业卫生监督管理规定》第20条。

7.6 - Auditor toured the workshops and workers interview, the auditee provided the earplugs and dustproof masks to the workers who connected with noise and dust, but the activated carbon masks were not provided to the workers who connected with glue. This violated the Law of the PRC on Work Safety Article 42.

审核员走访了车间现场以及工人访谈, 被审核方提供了耳塞和防尘口罩给接触噪音和粉尘的工人, 但未提供活性炭口罩给接触胶水的工人。这违反了《中华人民共和国安全生产法》第42条。

7.7 - 1. Auditor toured onsite workshops, there were glue, ethyl alcohol, machine oil, release agent used in the workshops, but it was noted that no valid chemical labels and secondary containment for glue containers were available. This violated Regulations on Safety in Workplaces Where Chemicals Are Used, Article 12 and 20, Regulations on the Safety Administration of Dangerous Chemicals, Article 20. 2. The related records on use, return and clear of chemicals were not saved for review. 3. MSDSs for chemicals were not posted onsite for reference at factory. This violated the Safety Management of Dangerous Chemicals, Article 15.

1. 审核员走访了现场车间, 有使用胶水, 酒精, 润滑油, 脱模剂, 但现场发现胶水容器未标有合适的化学品标识和配备有效的二次容器。这违反了《工作场所安全使用化学品规定》第12条和第20条, 以及《危险化学品安全管理条例》第20条。2. 被审核方未保留化学品的使用, 退回或清理记录查看。3. 被审核方现场未张贴MSDSs作为参考。这违反了《危险化学品安全管理条例》第15条。

7.9 - From onsite observation, the warning signs for PPEs were posted onsite and the electric switches were posted the warning signs for electricity, but it was noted that 5 electric switches missed the function labels as warning signs at assembling and packing workshop.

根据现场观察, 现场张贴了PPEs警示标语且电气开关张贴了触电警示标语, 但发现组装和包装车间5处电气开关失去功能标识(警示标语)。

7.11 - 1. From onsite checking, the auditee used three main buildings (One 3-storey office building, one 2-storey production building and one 1-storey warehouse building, about 5000 sq meters) in the plant and the building structure was in good condition, the buildings were built in 2004, but the building certificates were not provided for review. This violated the PRC Construction Law, Article 61. 2. The fire certificates for these buildings were not provided for review. This violated the PRC Fire Prevention Law, Article 11.

1. 被审核方使用了厂区内3栋主要建筑(1栋3层办公建筑, 1栋2层生产建筑和1栋1层仓库建筑, 大约5000平方米), 建筑外观完好, 建于2004年, 但未提供这些建筑的竣工验收报告查看。这违反了《中华人民共和国建筑法》第61条。2. 被审核方也未提供这些建筑的消防验收报告查看。违反了《中华人民共和国消防法》第11条。

7.13 - Auditor rechecked the records and onsite electric facilities, 95% electric boxes were installed with outer protective covers and the electrician inspected it once per month, but 20% electric boxes missed inner protective covers and outer protective covers were not locked, one electric box and one electric switch were not safeguarded with protective covers at smashing room. This violated General Guide for Safety of Electric User (GB/T 13869-2008) 6.7&6.8.

审核员核对了记录和现场电气设施，95%电箱均安装了外保护盖且电工每月检查一次，但发现厂区20%电箱失去内保护盖且外保护盖未上锁，粉碎房1处电气开关和1处电箱未安装防护罩。这违反了用电安全导则（GB/T 13869-2008）6.7和6.8。

7.16 - From onsite observation and management interview, it was noted that no evacuation plans as guidance were available at factory. 从现场观察和管理层交谈，现场未张贴疏散图作为逃生指引。

7.17 - 1. Auditor reviewed the document and toured the workshops, the operation procedures were formulated by the auditee, the production equipments were in good condition, but the auditee did not provide the lists of equipments and the maintaining records for production machines and other facilities. 2. It was noted that the working ladders (About 1 meter) leading to injecting machines were not installed with handrails at injecting workshop. This violated Machinery Safety: Fixed installations of entering machine and industrial facility Part 3: Staircase, ladder and handrail. 3. The auditee did not provide the annual inspection report and registration certificate for one cargo lift for review. This violated the Regulations on Safety Supervision of Special Appliance article 28.  
1. 审核员查阅了文件并走访了现场车间，被审核方制定了操作规程，设备均完好，但未提供设备清单，生产设备和有关设施的维护保养记录。2. 注塑车间通向注塑机的工作台阶（约1米）未安装扶手。这违反了机械安全：进入机器和工业设备的固定设施第3部分：楼梯、阶梯和护栏。3. 被审核方未提供1台货梯的年检报告和登记证。这违反了《特种设备安全监察条例》第28条。

7.22 - Auditor toured the toilets, the number of toilets were adequate and it was clean, but the toilets in the plant were not identified with genders, and no basic supplies such as toilet paper and soap were available.  
审核员走访了厕所，厕所数量是足够的且是干净的，但厂区内厕所无性别标识，且未配备厕纸和洗手液。

**Remarks from Auditee:**  
Nil

**Performance Area 8 : No Child Labour**

Full Audit [Audit Id - [redacted] Audit Date: 26/08/2020 PA Score: A Deadline date:

**GOOD PRACTICES:**  
None

**AREAS OF IMPROVEMENT:**  
None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. Auditor toured onsite and Production supervisor interview, the auditee enacted the policy regarding no child labour, did not hire the child labour at present and the child labour could not be employed in the future, all workers were over 18 years old by factory roster and personnel files review and interviewed with 5 workers. Meanwhile, the child labor rescue procedure was created.  
未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。审核员走访了现场且与生产主管交流，被审核方有制定禁止使用童工的政策，目前未使用童工，将来也不可能雇佣童工，通过花名册查看，人事档案审查和访谈5名工人，所有工人均大于18周岁。同时，也建立了童工拯救程序。

**Remarks from Auditee:**  
NA

**Performance Area 9 : Special protection for young workers**

Full Audit [Audit Id - [redacted] Audit Date: 26/08/2020 PA Score: A Deadline date:

**GOOD PRACTICES:**  
None

**AREAS OF IMPROVEMENT:**  
None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. Per workers interview, onsite observation and personnel files review, the auditee did not employ young workers, the youngest worker was beyond 29 years old at present. Office staff knew the local regulations on young workers, the auditee also fully taken young workers' special requirements into consideration, for example, the young workers did not work in hazardous posts such as mixing post.  
未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。依据工人访谈，现场审阅和人事档案查阅，被审核方未雇佣未成年工，目前最小年纪工人大于29周岁，办公人员知晓当地法律法规对未成年工的用工规定，被审核方也充分考虑了未成年工的特殊需求，例如，未成年工不能在危害岗位工作如拌料岗位。

**Remarks from Auditee:**  
NA

**Performance Area 10 : No Precarious Employment**

Full Audit [Audit Id - [redacted] Audit Date: 26/08/2020 PA Score: A Deadline date:

**GOOD PRACTICES:**  
None

**AREAS OF IMPROVEMENT:**  
None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. The auditee enacted the hiring procedure and provided the orientation training to new recruitment workers regarding to their rights such as wages and benefits, working hours, occupational health and safety and etc.. And Production supervisor declared that the auditee signed labor contracts with all the hired workers, the dispatched workers, seasonal workers, migrant workers, summer job workers, apprentice workers and temporary workers were not employed, 5 sampled workers said that they saved one copy for labor contract.  
未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。被审核方建立了招聘程序并给新进工人提供了关于他们的合法权利与义务的入职培训，比如工资福利、工作时间、职业健康安全等。且生产主管申明被审核方均与所有工人签订了劳动合同，未雇佣派遣工、季节工、外劳、暑期工、学徒以及临时工，且随机抽取的5名工人均表示他们保留了一份合同副本。

**Remarks from Auditee:**  
NA

<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - [REDACTED] Audit Date: 26/08/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. The auditee had the procedure for forced labour which showed that did not require the "deposit" or deposited their personal ID cards, new workers would be received the related training once recruitment. Meanwhile, Factory Management would supervise the daily issues to prevent from forced labour in the workplaces, the auditee would conduct the assessment on forced labour by internal audit to take effective measures avoiding or eradicating the practices in the workplaces regularly. 未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。被审核方有建立禁止强迫劳动政策，该政策表明不得扣押存款或员工身份证等私人证件，新员工一旦入职将接受有关培训。同时，管理层将监督日常工作，避免工作场所发生强迫劳动行为，且被审核方将定期通过内审对工作场所是否存在强迫劳动现象作定期评估，并采取有效的措施来避免或根除强迫劳动现象。	
<b>Remarks from Auditee:</b> NA	
<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - [REDACTED] Audit Date: 26/08/2020 PA Score: C	Deadline date: 25/08/2021
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The overall observation showed that the auditee partially fulfilled the requirement of this performance area. The auditee enacted the environment protection policy and appointed Production supervisor to be responsible for the environment issues, he knew the environmental influence factors on environmental and identified the impacts and environmental implications associated to its activity, established EIA and obtained EIA approval on Oct.11, 2019. The policy on saving water was developed, the auditee provided the training regarding environmental protection such as wastes management and saving water, they were aware of environmental protection and saving water. Meanwhile, no notice on environment violation from local government was issued to the auditee during the past 12 months during this audit. However, gaps had been identified in implementation: 整体观察显示，被审核方目前部分履行对该区域的要求。被审核方制定了环境保护政策并任命生产主管去负责环境事宜，他知道工厂对环境的影响因素且进行了环境因素识别，建立了EIA并在2019年10月11日获得了环评批复。被审核方也建立了节约用水政策，提供了环境保护如废弃物管理和节约用水培训，工人均有环境保护和节水意识。同时，过去12个月未发现被审核方有收到当地环境保护局的传票。然而，在实际执行过程中仍然存在问题： 12.3 - 1. The environmental policies were developed by the auditee, the mixing and smashing, injecting process were operated, which could discharge the noise, but did not conduct the monitoring for environmental factor on noise. This violated PRC Law of Prevention and Control of Pollution From Environmental Noise, Article 23. 2. From document review and management interview, the auditee produced pen, established EIA and obtained EIA approval on Oct.11, 2019, but did not obtain environmental protection completion acceptance report. This violated the Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project, Article 17. 1. 被审核方制定了环境政策，有拌料，粉碎和注塑工序运行，对外排放噪音，但未实施环境因素监测。这违反了《中华人民共和国环境噪声污染防治法》第23条。2. 从文件查看和管理层交流，被审核方生产笔，建立了EIA并在2019年10月11日获得了环评批复，但未获得环境竣工保护验收报告。这违反了《建设项目竣工环境保护验收管理办法》第17条。 12.4 - 1. From onsite checking and management interview, there were waste chemicals containers generated in the factory, but the auditee did not provide the handling contracts and transferred records for review. This violated the PRC Law of Prevention and Treatment of Environmental Pollution by Solid Wastes, Article 57. 2. Meanwhile, the empty chemical containers were stored at open area. This violated Standard on Pollution Control in Storage of Hazardous Waste (GB18597-2001). 1. 根据现场核查和管理层访谈，被审核方产生化学品空桶，但未提供与有资质处理单位签署的处理协议和转移记录。这违反了《中华人民共和国固体废物污染环境防治法》第57条。2. 同时，现场发现化学品空桶露天存放。这违反了危险废物贮存污染控制标准（GB18597-2001）。	
<b>Remarks from Auditee:</b> Nil	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - [REDACTED] Audit Date: 26/08/2020 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> None observed. The overall observation showed that the auditee currently fulfilled the requirement of this performance area. During this audit, auditor reviewed the requested documents in a timely manner and toured all audited areas. Per document and record review, the auditee developed the procedures on ethics and integrity, provided the training for ethics and integrity, key employees had the awareness. At the same time, the auditee knew the importance of ethics and integrity for long-term development, General Manager would supervise the key employees. 未发现不符合项。整体观察显示，被审核方目前履行对该区域的要求。本次审核，审核员查阅了要求的文件并走访了所有审核区域。从文件和记录查看，被审核方制定了商业道德诚信政策，提供了相关培训，关键人员有一定的意识。同时，被审核方也知道商业诚信对公司长远发展的重要性，总经理将监督关键人员。	
<b>Remarks from Auditee:</b> NA	

Producer : [REDACTED]

DBID : [REDACTED] and Audit Id : [REDACTED]  
Audit Type : Full Audit

Audit Date : 26/08/2020

Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	26/08/2020	[REDACTED]	D	B	A	A	C	D	C	A	A	A	A	C	A	C



Producer Photos



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



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



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



External photo(s) of the production unit(s)  
The fingerprint attendance recorder.JPG



External photo(s) of the production unit(s)  
The gps datum by phone.JPG



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



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



External photo(s) of the production unit(s)  
The warehouse and production buildings.JPG



External photo(s) of the production unit(s)  
The warning signs for electricity.JPG



Photo first aid facilities  
The first aid kits.JPG



Photo of chemical storage room (if applicable)  
The chemicals.JPG



Photo of fire safety equipment  
The buttons for fire alarms.JPG



Photo of fire safety equipment  
The emergency exits with exit signs and emergency lights.JPG



Photo of fire safety equipment  
The evacuation indicating signs and emergency lights along passageways.JPG



Photo of fire safety equipment  
The evacuation indicating signs and emergency lights along stairs.JPG



Photo of fire safety equipment  
The fire alarms.JPG



Photo of fire safety equipment  
The fire extinguishers were in good condition.JPG



Photo of fire safety equipment  
The fire fighting equipment.JPG



Photo of fire safety equipment  
The inspection records for fire hydrants.JPG



Photo of fire safety equipment  
The testing for emergency lights.JPG



Photo of fire safety equipment  
The testing for fire hydrant.JPG



Photo of non conformity  
NC 5 electric switches missed function labels as warning signs.JPG



Photo of non conformity  
NC cluttered carbon masks were not provided.JPG



Photo of non conformity  
NC Empty chemical containers were stored at open area.JPG



Photo of non conformity  
NC No evacuation plans at office building.JPG



Photo of non conformity  
NC No evacuation plans at production areas.JPG



Photo of non conformity  
NC No handrails.JPG



Photo of non conformity  
NC No inner protective covers and outer protective covers were not locked.JPG

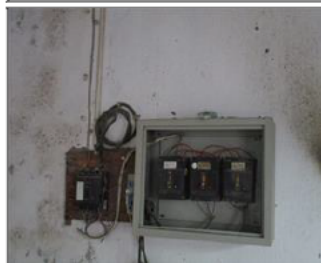


Photo of non conformity  
NC No safeguarded.JPG



Photo of non conformity  
NC No valid chemical labels and secondary containment and posted MSDS.JPG





Photo of non conformity  
NC Raw materials were stored against the walls.JPG



Photo of non conformity  
NC Toilets were not identified with genders and no basic supplies.JPG



Photo of the code of conduct on display  
The Amfori BSCI Code of Conduct posted.JPG



Photo of the personal protection equipments (if applicable)  
The earplugs and dustproof masks.JPG



Photo of the personal protection equipments (if applicable)  
The warning sign for mask.JPG



Photo of the sanitary facilities  
The drinking water.JPG



Photo of the sanitary facilities  
The toilets.JPG



Photo of the inside of the main production hall  
The injecting 1.JPG



Photo of the inside of the main production hall  
The injecting 2.JPG



Photo of the inside of the main production hall  
The inspecting and assembling and packing 1.JPG



Photo of the inside of the main production hall  
The inspecting and assembling and packing 2.JPG



Photo of the inside of the main production hall  
The materials and finished products warehouse.JPG



Photo of the inside of the main production hall  
The mould processing.JPG



Photo of the inside of the main production hall  
The raw materials and mixing.JPG



Photo of the inside of the main production hall  
The smashing.JPG