



Sedex Members Ethical Trade Audit Report

Version 6.0



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC: [REDACTED]	Sedex Site Reference: (only available on Sedex System)	ZS: [REDACTED]
Business name (Company name):	[REDACTED] Ltd		
Site name:	[REDACTED] Ltd		
Site address: (Please include full address)	[REDACTED] [REDACTED] [REDACTED] [REDACTED] Xiamen City , FUJIAN province, P R China	Country:	China
Site contact and job title:	[REDACTED] Administration Dept. Manager		
Site phone:	[REDACTED]	Site e-mail:	[REDACTED]
SMETA Audit Type Pillars:	☒ Labour Standards	☒ Health & Safety	☒ Environment ☒ Business Ethics
Date of Audit:	15 th to 16 th May, 2019		

Audit Company Name & Logo: Bureau Veritas 	Report Owner (payee): [REDACTED] Ltd
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Audit Conducted By					
Commercial	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	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 6.0 April 2017 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.

Any exceptions to this must be recorded here (e.g. different sample size):	None
Auditor Team (s) (please list all including all interviewers):	
Lead auditor:	ZHIHUA ZHU
Team auditor:	/
Interviewers:	ZHIHUA ZHU
Report writer:	ZHIHUA ZHU
Report reviewer:	Chitra Kawale
Audit Company Report Reference:	[REDACTED]
Date of declaration:	24 th May 2019

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.

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

Non-Compliance Table

Issue (please click on the issue title to go direct to the appropriate audit results by clause) Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.		Area of Non-Conformity (Only check box when there is a non-conformity, and only in the box/es where the non-conformity can be found)				Record the number of issues by line*:			Findings (note to auditor, summarise in as few words as possible NCs, Obs and GE)
		ETI Base Code	Local Law	Additional Elements	Customer Code	NC	Obs	GE	
0A	Universal Rights covering UNGP			☐	☐				
0B	Management systems and code implementation	☒	☐	☐	☐	1			Nearest internal audit was conducted on 19~20 April, 2018. But internal procedure required it should be conducted every one year.
1.	Freely chosen Employment	☐	☐		☐				
2	Freedom of Association	☐	☐		☐				
3	Safety and Hygienic Conditions	☒	☒		☐	2			The company did not provide regular health examination to three workers who contact noise on Double sewing process. - Soap or hand washing was not provided at the washing room in the No. 3 floor production workshop.

4	<u>Child Labour</u>	☐	☐		☐				
5	<u>Living Wages and Benefits</u>	☐	☐		☐				
6	<u>Working Hours</u>	☐	☐		☐				
7	<u>Discrimination</u>	☒	☐		☐	1			It was found one normal job was limited age on web employment advertisement.
8	<u>Regular Employment</u>	☐	☐	☐	☐				
8A	<u>Sub-Contracting and Homeworking</u>		☐	☐	☐				
9	<u>Harsh or Inhumane Treatment</u>	☐	☐	☐	☐				
10A	<u>Entitlement to Work</u>		☐	☐	☐				
10B2	<u>Environment 2-Pillar</u>		☐	☐	☐				

10B4	<u>Environment 4-Pillar</u>		☐	☐	☐				• •
10C	<u>Business Ethics</u>		☐	☐	☐				• •
General observations and summary of the site:									
Top management supports with acceptable attitude on system improvement. Most of interviewed workers are basically satisfied with the factory's situation and benefit. All documentations were requested in a timely manner.									

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

Site Details

Site Details																										
A: Company Name:	Ltd																									
B: Site name:	Ltd																									
C: GPS location: (if available)	GPS Address:/	Latitude:/ Longitude:/																								
D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections	Business license: Valid date: from 2007.11.05 to 2027.11.04																									
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc.	Manufacturing of non-woven bags and other eco-friendly bags																									
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	The company is located at Xiamen City, Fujian Province, China. The factory was built at 2007. There are currently about 387 employees in the company. The factory size is about 6500 sq.m. There was 1 building in company. The main process including cutting, sewing, packaging. There were 9 product lines in the company. In view of the facilities, the factory occupies 2/F, part of 4/F, part of 5/F and whole 3/F of one 6-storey building, which are used as the office, production floor and warehouse. No dormitory, canteen or kitchen is available for workers. The factory rent all operation area from Xiamen Kangbeier Biological Science and Technology Co., Ltd. For below, please add any extra rows if appropriate. <table border="1"> <thead> <tr> <th>Production Building</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td>Floor 1</td> <td>Other factory</td> <td>Machine manufacturing</td> </tr> <tr> <td>Floor 2</td> <td>Sample room, Workshop and warehouse</td> <td>na</td> </tr> <tr> <td>Floor 3</td> <td>Office, Workshop and warehouse</td> <td>na</td> </tr> <tr> <td>Floor 4</td> <td>Office, Workshop and warehouse</td> <td>Part of Other factory is photo frame manufacturing.</td> </tr> <tr> <td>Floor 5</td> <td>Workshop and warehouse</td> <td>na</td> </tr> <tr> <td>Floor 6</td> <td>other factory</td> <td>na</td> </tr> <tr> <td>Is this a shared building?</td> <td>Yes</td> <td>There were other factories shared the</td> </tr> </tbody> </table>		Production Building	Description	Remark, if any	Floor 1	Other factory	Machine manufacturing	Floor 2	Sample room, Workshop and warehouse	na	Floor 3	Office, Workshop and warehouse	na	Floor 4	Office, Workshop and warehouse	Part of Other factory is photo frame manufacturing.	Floor 5	Workshop and warehouse	na	Floor 6	other factory	na	Is this a shared building?	Yes	There were other factories shared the
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	same building. The audited factory management explained that they and other facilities had separate business licenses, with individual financial system, production management and personnel management. And according to the employee interview, they confirmed the situation, and they also stated that the employees in other factories would not flow in each other.
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I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Manufacture of non-woven bags and other eco-friendly bags. The main process including cutting, sewing, packaging. There are 9 product lines. There are 265 sewing equipment, 3 cutting equipment in the company.
J: What form of worker representation / union is there on site?	☒ Union (name): Ltd trade union ☒ Worker Committee: 9 worker representatives were elected by the workers' themselves. ☐ Other (specify): ☐ None
K: Is there any night production work at the site?	☐ Yes ☒ No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ☒ No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	☐ Yes ☒ No If Yes approx. % of workers
N: Were all site provided accommodation buildings included in this audit	☐ Yes ☐ No If No, please give details Na, No accommodation building was provided including in this audit. The interview workers said they lived the house themselves out of audit site.

Audit Parameters		
A: Time in and time out	Day 1 Time in: 9:00 Day 1 Time out: 20:00	Day 2 Time in: 9:00 Day 2 Time out: 20:00
B: Number of auditor days used:	1 auditor * 2.5 days =2.5 man days on site and 0.5 man days off site	
C: Audit type:	☐ Full Initial ☒ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:	
D: Was the audit announced?	☒ Announced ☐ Semi – announced: Window detail: weeks ☐ Unannounced	
E: Was the Sedex SAQ available for review?	☒ Yes ☐ No If No, why not	
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If Yes , please capture detail in appropriate audit by clause	
G: Who signed and agreed CAPR (Name and job title)	Adm. Manager	
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☒ No	
I: Previous audit date:	5 th to 6 th June, 2018	
J: Previous audit type:	SMETA 4P	
K: Were any previous audits reviewed for this audit	☒ Yes ☐ No ☐ N/A	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
C: Present at the closing meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	NA		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	NA		

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 and where they do not intend to remain permanently 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*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	76	0	0	0	0	0	0	76
Worker numbers – female	311	0	0	0	0	0	0	311
Total	387	0	0	0	0	0	0	387
Number of Workers interviewed – male	8	0	0	0	0	0	0	8
Number of Workers interviewed – female	18	0	0	0	0	0	0	18
Total – interviewed sample size	26	0	0	0	0	0	0	26

A: Nationality of Management	China
B: Nationality of workers <i>Please add more rows as applicable</i>	Countries: Country 1: <u>China</u> Country 2: _____ Country 3: _____
C: For the majority nationality of workers:	Nationality 1 approx % total workforce <u>100%</u> Nationality 2 approx % total workforce _____ Nationality 3 approx % total workforce _____
D: Worker remuneration (management information)	_____ % workers on piece rate _____ % hourly paid workers _____ % salaried workers Payment cycle: _____ % daily paid _____ % weekly paid

	_100____% monthly paid _____% other If other, please give details
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Worker Interview Summary	
A: Were workers aware of the audit?	☒ Yes ☐ No
B: Were workers aware of the code?	☐ Yes ☒ No One NCR was raised.
C: Number of group interviews: (Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)	20, 4 groups of 5
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	Male: 2 Female: 4
E: 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. <i>Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment</i>	☒ Yes ☐ No If no, please give details
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☒ Yes ☐ No
G: In general, what was the attitude of the workers towards their workplace?	☒ Favourable ☐ Non-favourable ☐ Indifferent
H: What was the most common worker complaint?	Nil.
I: What did the workers like the most about working at this site?	The company is regular and the benefit was good in the area.
J: Any additional comment(s) regarding interviews:	Nil.
K: Attitude of workers to hours worked:	Positive.
L. Is there any worker survey information available?	
☐ Yes ☒ No If yes, please give details:	
M: Attitude of workers: (Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk	

Most of interviewed workers are basically satisfied with the factory's situation and benefit. They had good relationships with their supervisors and managers who treated them with respect. They are relaxed and comfortable.
No negative information was provided from interviewed workers.

N: Attitude of worker's committee/union reps:

(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

The worker representatives within the facility was freely elected without management interference, they was allowed to carry out activities relating to employees' right and interest without management interference, and was given access to the workplace in order to carry out their representative functions. They provided more positive information, such as on time paid, enough benefit.

O: Attitude of managers:

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

Full access was granted to documentation review, factory tour and employee interview. Locked areas encountered during the audit were unlocked timely. All documentations were requested in a timely manner.

At the end of the audit, all the findings were accepted by the factory management.

Audit Results by Clause

0A: Universal Rights covering UNGP

[\(Click here to return to NC-table\)](#)

0.A. Guidance for Observations

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:

The CSR policy was defined on procedure according to relevant requirement.

[REDACTED] was designated as Management representative to implement standards concerning Human rights.

Stakeholders and salient issues were identified.

The impacts on stakeholders were measured every year.

Corrective action procedure was established to handle adverse impact on human rights.

The relevant procedure was established for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter.

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

Details:

Corrective action procedure, stakeholder form, salient issues form, impact measuring form

Any other comments:

No

A: Policy statement that expresses commitment to respect human rights?

☒ Yes

☐ No

Please give details (mainly applicable for the parent company):

	The policy was stated according with all human right elements.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Please give details: Name: [REDACTED] Job title: GM
C: Does the businesses have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☒ Yes ☐ No Please give details: The relevant procedure was established.
D: Does grievance mechanism meet with UNGP requirement of e.g. (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)?	☒ Yes ☐ No If no, please give details:
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No Please give details: The relevant procedure was established. It was communicated with workers effectively, and all workers' information was kept and locked in HR office.

Findings: NA	
Finding: Observation ☐ Company NC ☐ Description of observation: Local law or ETI/Additional elements / customer specific requirement: Comments:	Objective evidence observed:

Good examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Measuring Workplace Impact

Workplace Impact		
A: 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: 8 %	This year 4 %
B: 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 1 st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	4%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 st day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	Last year: 0 %	This year 0 %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0	0
E: Are accidents recorded?	☒ Yes ☐ No Please describe: No accident was happened near 12 months	
F: 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 Number: 0	This year:0 Number:0
G: 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
H: 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	This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	6 months 0 % workers	12 months 0 % workers
J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	6 months 0 % workers	12 months 0 % 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:

The company established the system to deliver compliance to this code, the HR manager was appointed as Management representative to be responsible for the maintaining and improvement of the code. All employees know basic requirement in this code, their main suppliers were noticed the ETI and signed written commitment to the ETI.

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

Details:

Training records, Worker interview, supplier's written commitment

Any other comments:
none

Management Systems:

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

☐ Yes
☒ No

Please describe: No relevant issue was found.

B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?

☒ Yes
☐ No

Please describe: The relevant files was established and defined.

C: If Yes, is there evidence (an indication) of effective implementation? Please give details.

The ID card check was used to identify how old the recruit was during the recruiting process. ID copy was collected and kept for all employees in the company.
Some employees were sampled on-site. The personal information was available at the HR Dept. No young workers and child workers were observed in the company.
No lodging of ID card or 'deposits' was required when worker joined the company.
The company also doesn't deduct part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.
Overtime work is a voluntary choice by employees.
Production of workers is from Villages.
All of them can get all kinds of job.
The disciplinary practice rule defined in employee manual respected the national laws.

	The disciplinary regulations include oral warning, written warning and dismissal are defined for employees who don't obey the management regulation, no corporal punishment, mental or physical coercion and verbal abuse was found during audit.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No Please describe: The requirement of relevant files were trained to all employees, the record was kept well.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☒ Yes ☐ No Please describe: All interviewed employees know the relevant requirement. Relevant training record can be provided.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). Please detail (Number and date).	☒ Yes ☐ No Please describe: ISO9001, BV, 2017-07-27~2020-07-26; SA8000, BV, 2018-08-02~2021-08-01; ISO14001, ICAS, 2018-05-18~2021-05-17; BRC,ITS, ~2020-02-26;
G: Is there a Human Resources manager/department? If Yes, please detail.	☒ Yes ☐ No Please describe: HR director
H: Is there a senior person /manager responsible for implementation of the code	☒ Yes ☐ No Please describe: Administration Dept. Manager
I: Is there a policy to ensure all worker information is confidential	☒ Yes ☐ No Please describe: The confidential policy was defined.
J: Is there an effective procedure to ensure confidential information is kept confidential	☒ Yes ☐ No Please describe: The confidential information management procedure was established.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ No Details: the risk assessment was conducted by internal audits of its management systems.

L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☒ Yes ☐ No Details: Any problems found at internal audit are brought to the attention of senior management and corrections made.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☒ Yes ☐ No Details: the policy was defined.
Land rights	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	☒ Yes ☐ No Details: the licenses can be provided. (Expiration date: 2055.1.4)
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☒ Yes ☐ No Details: the relevant procedure was established.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☒ Yes ☐ No If yes, how does the company obtain FPIC: All land rights of the factory were got from local government. And all land rights are used as industrial, after 50 years the factory must handle the land according to the requirement of local government.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	☒ Yes ☐ No Details: the factory bought the land from local government and got the land license.
R. Does the Facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes ☐ No Details: NA. The factory bought the land from local government and got the land license.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☒ No Details: the factory bought the land from local government and got the land license.

Non-compliance:

1. Description of non-compliance:

☒ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Nearest internal audit was conducted on 19th ~20th April, 2018. But internal procedure required it should be conducted every one year.

Local law and/or ETI requirement:

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

Recommended corrective action:

The company should conduct internal audit every year according to internal procedure.

Objective evidence observed:

(where relevant please add photo numbers)

Document review

Observation: NA

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: NA

Description of Good Example (GE):

Objective evidence observed:

1: Freely Chosen Employment

[\(Click here to return to NC-table\)](#)

ETI

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

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

Current Systems and Evidence Examined

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

Current systems:

No lodging of ID card or 'deposits' was required when worker joined the company. The company also doesn't deduct part of any personnel's salary, benefits, property, or documents in order to force such personnel to continue working for the company.

Overtime work is a voluntary choice by employees.

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

Details:

Document review, and worker interview

Any other comments:

none

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☒ No If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ☒ No If yes, please give details and category of workers affected:
C: Is there any evidence of retention of wages /deposits	☐ Yes ☒ No If yes, please give details and category of workers affected:
D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☒ No Please describe finding: All staffs are free to leave on termination of employment.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there is a	☐ Yes ☐ No Please describe finding:

published 'modern day slavery statement.	na ☒ Not applicable
G: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☒ No Please describe finding: The worker can leave the site every time free.
H: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☒ Yes ☐ No If yes, please give details and category of workers affected: The factory communicated the suppliers with this item. ☐ Not applicable
I: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☒ Yes ☐ No Please describe finding: the policy and procedure were established.

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law: ☐ NC against customer code:

Local law and/or ETI requirement

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation: NA

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: NA

Description of Good Example (GE):	Objective evidence observed:
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2: Freedom of Association and Right to Collective Bargaining are Respected

[\(Click here to return to NC-table\)](#)

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ETI

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

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.

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

Current Systems and Evidence Examined

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

Current systems:

Through the factory management interview and workers' interview, it was noted that trade union was established and the workers elected 2 worker representatives. Workers can raise their concerns through worker representatives, telephone, suggestion box, meeting and their team leader or above. The last communication meeting was held on Mar., 2019.

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

Details:

Document review, and worker interview

Any other comments:

none

A: What form of worker representation/union is there on site?	☒ Union (name) : Ltd trade union ☒ Worker Committee: 9 workers representatives were elected by the workers' themselves. ☐ Other (specify) ☐ None
B: Is it a legal requirement to have a union?	☐ Yes ☒ No
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☒ No
D: Is there any other form of effective worker/management communication channel? (Other	☒ Yes ☐ No Describe: H&S committee

than union/worker committee e.g. H&S, sexual harassment)	Is there evidence of free elections? ☒ Yes ☐ No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☒ Yes ☐ No Details: meeting room	
F: Name of union and union representative, if applicable:	Ltd trade union was established.	Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	The workers elected 9 worker representatives.	Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	
I: Were worker representatives freely elected?	☒ Yes ☐ No	Date of last election: 2 Jan., 2019
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	
K: Were worker representatives/union representatives interviewed?	☒ Yes ☐ No If Yes , please state how many: 2 worker representatives	
L: Please describe any evidence that union/worker's committee is effective? <i>Specify date of last meeting; topics covered; how minutes were communicated etc.</i>	The last communication meeting was held on 18 Mar., 2019. It covered wage, overtime, health safety etc. Above 30 minutes were communicated.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No NA. No CBA in the facility.	
If Yes , what percentage by trade Union/worker representation	<u>0</u> % workers covered by Union CBA	<u>0</u> % workers covered by worker rep CBA
If Yes , does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No NA. No CBA in the facility.	

Non-compliance: NA	
1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Local law and/or ETI requirement: Recommended orrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:
Good Examples observed: NA	
Description of Good Example (GE):	Objective evidence observed:

3: Working Conditions are Safe and Hygienic

[\(Click here to return to NC-table\)](#)

[\(Click here to return to Key Information\)](#)

ETI

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

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

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

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

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

Current Systems and Evidence Examined

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

Current systems:

H&S management system was implementing in the company. was appointed H&S representative.

Fire check and acceptance reports were available for the premises. Construction inspection reports were available.

Fire facilities were inspected monthly. Fire drill was implemented per year. The records showed that the drill covered all building and all shifts in the company. The evacuation maps were available.

The passage was kept well.

Fire facility is enough in the area.

Workshop air quality inspection report was issued on 27/08/2018.

Clean and sufficient toilets were provided at the factory site.

Portable drinking water was provided to workers.

Health examination was provided to relevant workers every year.

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

Details:

Fire check and acceptance reports were available

Fire facilities maintenance reports were available

Fire drill records: 16/04/2019.

Workshop air quality inspection report was issued on 27/08/2018.

Three cargo elevators, valid date: 11 Mar. 2019~Mar. 2020;

Health safety examination date:22 Mar., 2019

The building structure safety certificate on Apr. 2007.

The fire safety verified by local fire brigade meet the requirement of local law on Mar. 2007: 海公消（建验）字【2007】第 0017 号.

Any other comments:

none

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☒ Yes ☐ No Details: the relevant requirement was trained to all workers.
B: Are the policies included in workers' manuals?	☒ Yes ☐ No Details: the policies were defined on manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No Details: na
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No Details: the factory provided PPE to visitor.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	☒ Yes ☐ No Details: First aid box was provided to all area. It meets with local legal requirement
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☒ Yes ☐ No Details: first aider had trained medical aid on every building floor.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by competent persons e.g. buses and other vehicles?	☐ Yes ☐ No Details: Na, no transport was proved to workers.
H: Is secure personal storage space provided for workers in their living space and is it fit for purpose?	☐ Yes ☐ No Details: N/A, no accommodation was provided to staffs.

I: Are H&S Risk assessments conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☒ Yes ☐ No Details: risk form can be provided. The H&S risks were identified in the company and updated per year, which have included the basic situations (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and have covered the all workshops in the company, the corresponding countermeasures were identified and established, the documented list of the risk and control were provided on site.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☐ Yes ☐ No Please describe: NA, No legal permits was needed.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☒ Yes ☐ No Please describe: the test report can be provided. The company collected material test report about pesticide residues and heavy metal which is the law of banned chemicals, the test result can meet with the law.

Non-compliance:	
1. Description of non-compliance: ☐ NC against ETI ☒ NC against Local Law ☐ NC against customer code: The company did not provide regular health examination to three workers who contact noise on Double sewing process. Local law and/or ETI requirement In accordance with PRC Occupation Prevention Law article 35: the company must provide health examination to workers who contact occupational risk regularly. Recommended corrective action: The company should provide health examination to all occupation position workers on time. 2. Description of non-compliance: ☒ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Soap or hand washing was not provided at the washing room in the No. 3 floor production workshop. Local law and/or ETI requirement:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

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.

Recommended corrective action:

Soap or hand washing should be provided at the washing room in the production workshop.

Observation:

Description of observation:

Local law or ETI requirement:

Recommended corrective action:

Objective evidence observed:

Good Examples observed:

Description of Good Example (GE):

Objective Evidence Observed:

4: Child Labour Shall Not Be Used

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ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

Current Systems and Evidence Examined

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

Current systems:

The ID card check was used to identify how old the recruit was in the recruit process. ID copy was collected and kept for all employees in the company.

Some employees were sampled on-site. The personal information was available at the HR Dept. No young workers and child workers found in the company.

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

Details:

Employee manual, employment policy, employee name list

Any other comments:

none

A: Legal age of employment:	16 Years
B: Age of youngest worker found:	19 Years
C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☒ No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☒ No If yes, please give details

Non-compliance: NA

1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
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Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

5: Living Wages are Paid

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[\(Click here to return to Key information\)](#)

ETI

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

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

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

Current Systems and Evidence Examined

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

Current systems:

- 1) All employees are paid at least compliance with local minimum wages; interviewed workers state they are most favourable that they have basic income while taking care of their family.
- 2) All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment;
- 3) The workers know about the particulars of their wages for the pay period concerned each time that they are paid. (The company paid last month's wage on the 15th of every month)

There were no deductions from wage from pay roll record and worker interview.

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

Wage payment detailed record near one year and delivery record by bank transfer; Employee manual, The insurance purchasing record etc.

Details:

Local minimum wage regulation: 1700 Yuan/month

The company had provided group commercial incident insurance to all employees; this commercial insurance is not mandated by PRC Social insurance law.

Any other comments:

none

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

Objective evidence observed:

(where relevant please add photo numbers)

Local law and/or ETI requirement: Recommended corrective action:	
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Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Summary Information

Criteria	Local Law (Please state legal requirement)	Actual at the Site (Record site results against the law)	Is this part of a Collective Bargaining Agreement?
A: Standard/Contracted work hours: (Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)	Legal maximum: 40 hours per week	40 hours per week	☐ Yes ☐ No No Collective Bargaining Agreement in the facility.
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 3 hours a day, 36 hours a month	Max 2 hours a day, max 18 hours a week	☐ Yes ☐ No No Collective Bargaining Agreement in the facility.
C: wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	1700 Yuan/month;	1700 Yuan/month;	☐ Yes ☐ No No Collective Bargaining Agreement in the facility.
D: overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	Legal minimum: 1.5 times of normal hour wage for overtime in standard working day, 2 times of normal hour wage for weekends overtime, 3 times of normal hour wage for National holidays overtime	1.5 times of normal hour wage for overtime in standard working day, 2 times of normal hour wage for weekends overtime, 3 times of normal hour wage for National holidays overtime	☐ Yes ☐ No No Collective Bargaining Agreement in the facility.

Wages analysis:			
(Click here to return to Key Information)			
A: Were accurate records shown at the first request?	☒ Yes ☐ No		
If No , why not?	NA		
B: 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)	26 samples from 02/2019 26 samples from 11/2018(random month) 26 sample from 04/2019 (current month) (The wage was paid on 15 th every next month.)		
C: Are there different legal minimum wage grades? If Yes , please specify all.	☐ Yes ☒ No	If Yes , please give details:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A	If No , please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☒ Meet ☐ Above	Lowest actual wages found: Note: full time employees and please state hour / week / month etc. 9.77RMB/hour, 390.8 RMB/Week, 1700 RMB/month	
F: Please indicate the breakdown of workforce per earnings:	above	___% of workforce earning under min wage ___% of workforce earning min wage ___100___% of workforce earning above min wage	
F: Bonus scheme found: Please specify details:	Bonus Scheme found: Note: full time employees and please state hour / week / month etc. Full attendance allowance (60RMB/month) + food allowance (20RMB/day) + Seniority allowance (100 RMB/month) + House allowance (232.96 RMB/month) was provided to all staffs.		
H: What deductions are required by law e.g. social insurance? Please state all types:	Personal income tax and Social Insurance Personal income tax should be raised if the gross wage is over 3500RMB.		
I: Have these deductions been made? Please list all deductions that have/have not been made.	☒ Yes ☐ No	Please list all deductions that have been made.	1. Social Insurance 2. Personal income tax Please describe: Personal income tax and Social Insurance

			Were deducted according to local legal.
		Please list all deductions that have not been made.	1. 2. Please describe:
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No		
K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:		
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☒ Yes ☐ No Please give details: the company paid wage to workers with all attendance time.		
M: Is there a defined living wage: <i>This is <u>not normally</u> minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	☐ Yes ☒ No Please specify amount/time:		
If yes, what was the calculation method used.	☐ ISEAL/Anker Benchmarks ☐ Asia Floor Wage ☐ Figures provided by Unions ☐ Living Wage Foundation UK ☐ Fair Wear Wage Ladder ☐ Fairtrade Foundation Other – please give details: NA		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☒ Yes ☐ No Please give details: The factory reviewed the wages yearly refer to local bureau, etc.		
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No		
P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No Please give details: workers can get equal rates for equal work.		

Q: How are workers paid:

- ☐ Cash
- ☐ Cheque
- ☒ Bank Transfer
- ☐ Other

If other, please explain:

6: Working Hours are not Excessive

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[\(Click here to return to Key Information\)](#)

ETI

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

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

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

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

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

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

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

Current Systems and Evidence Examined

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

Current systems:

Normally, five days a week, 8 hours a day, Saturday as overtime and pay two times wage of normal time. Most employees could have one day rest days per week.

Sample month check was conducted:

26 samples from 05/2019
26 samples from 11/2018
26 sample from 02/2019
26 sample from 04/2019

Normal employees work in one shift : 08:00~12 : 00,13 : 30~17:30

Employees' wages are calculated on hour rated basis.

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

Details:
Employees electric attendance records, employee manual

Any other comments:
none

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence observed:
(where relevant please add photo numbers)

Observation: NA

Description of observation:

Local law or ETI requirement:

Comments:

Objective evidence observed:

Good Examples observed: NA

Description of Good Example (GE):

Objective Evidence Observed:

Working hours' analysis Please include time e.g. hour/week/month (Go back to Key information)					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: Finger print system				
B: Is sample size same as in wages section?	☒ Yes ☐ No If no, please give details				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	☒ Yes ☐ No	If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements. Please give details:			
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	If YES, please complete as appropriate:			
		☐ 0 hrs	☐ Part time	☐ Variable hrs	☐ Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in contracts/employment agreements exceed 48 hours per week?	☐ Yes ☒ No	If yes, please detail hours, %, types of workers affected and frequency Please give details:			
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	Please select all applicable: ☒ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:		Is this allowed by local law? ☐ Yes ☐ No		
	Maximum number of days worked without a day off (in sample):				
	6 Days				
Standard/Contracted Hours worked					

G: Were standard working hours over 48 hours per week found?	☐ Yes ☒ No	If yes, % of workers & frequency:
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☒ Yes ☐ No	If yes, please give details: Comprehensive working hour approval from July, 2017 to July, 2019;
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours:	2 hours/ day, 18 hours/week, 44 hours/month;
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☒ No	
K: Approximate percentage of total workers on highest overtime hours:	90 %	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Check Wording of contract and handbook, the workers can choose overtime or not. The result of worker interview show the worker can leave the work station without any approving after standard working hours.
Overtime Premiums		
M: Are the correct legal overtime premiums paid?	☒ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of standard wages: 150% for standard day overtime, 200% for rest day overtime
N: Is overtime paid at a premium?	☒ Yes ☐ No	If yes, please describe % of workers & frequency: 100% workers and paid every month.

O: 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.	☒ No ☐ Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) ☐ Collective Bargaining agreements ☐ Other Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other NA
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	☐ Overtime is voluntary ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify) Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other: NA
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☒ No If yes, please give details:
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	☐ Yes ☒ No

7: No Discrimination is Practiced

[\(Click here to return to NC-table\)](#)

ETI

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

Current Systems and Evidence Examined

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

Current systems:

No negative finding. Recruitment announcement, electronic employment advertisement showing in the highest place of production building

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

Details:

Recruitment announcement, electronic employment advertisement showing in the highest place of production building.

Any other comments:
none

A: Gender breakdown of Management + Supervisors (Include as one combined group)	Male: <u>70</u> % Female: <u>30</u> %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	#: 6
C: 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?:	☐ Hiring ☐ Compensation ☐ access to training ☐ promotion ☐ termination or retirement no

Professional Development

A: What type of training and development are available for workers?	Quality and safety training were provided to all workers. And the worker can develop to workshop leader if they get more skill on position.
---	---

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details:
--	---

Non-compliance:	
1. Description of non-compliance: ☒ NC against ETI ☐ NC against Local Law ☐ NC against customer code: It was found one normal job was limited age on web employment advertisement. Local law and/or ETI requirement: 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. Recommended corrective action: The company should not limit age on normal position.	Objective evidence observed: <i>(where relevant please add photo numbers)</i> Document review

Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

8: Regular Employment Is Provided

[\[Click here to return to NC-table\]](#)

[\[Click here to return to Key Information\]](#)

ETI

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

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

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:

All employees are permanent, all have labour contracts with the supplier, the purchasing rate of social insurance is approved by local government.

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

Details:

Employee manual, labour contract, insurance purchasing records, approval for social insurances.

Any other comments:

none

Non-compliance: NA

1. Description of non-compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Local law and/or ETI requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
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Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Responsible Recruitment

All Workers	
A: 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 If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☒ No If yes, please describe details and specific category(ies) of workers affected:
C: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other – please give details
D: If any checked, give details:	NA

Migrant Workers:-na

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 and where they do not intend to remain permanently or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity

A: Type of work undertaken by migrant workers:	
B: Migrant worker recruitment	Total number of (in country recruitment agencies) used: Total number of (outside of local country) recruitment agencies used

C: 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?	☐ Yes ☐ No Please describe finding:	Observations
D: Are any migrant workers in skilled, technical, or management roles <i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i>	☐ Yes ☐ No If yes number and example of roles:	

NON-EMPLOYEE WORKERS-na

Recruitment Fees:	
A: Are there any fees?	☐ Yes ☐ No
B: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other – please give details
C: If any checked, give details:	

Agency Workers (if applicable)-na <i>(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.)</i>	
A: Number of agencies used (average):	Names if available:

B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No
C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No Please give details:
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No Please give details:

Contractors:-na <i>Note: 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,</i>	
A: Any contractors on site?	☐ Yes ☐ No If yes, how many contractors are present, please give details:
B: If Yes , how many workers supplied by contractors?	
C: Do all contractor workers understand their terms of employment?	☐ Yes ☐ No Please describe finding:
D: If Yes , please give evidence for contractor workers being paid per law:	

8A: Sub-Contracting and Homeworking:

8A: Sub-Contracting and Homeworking

[\(Click here to return to NC-table\)](#)
[\(Click here to return to Key Information\)](#)

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

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

Note to auditor on homeworking:

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

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

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:

No homeworking was found on the company.

Two subcontractors of printing process were used in the company. Relevant business license, assessment report and relevant materials input records were provided for review.

Subcontracting was approved by main client.

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

1. Business license, assessment report and relevant materials input records of subcontractor
2. Management interview and employee interview
3. Factory tour
4. Quality records
5. Approved file by client of subcontractor.

If any processes are sub-contracted – please populate below boxes

Process Subcontracted	Process 1 printing process	Process 2 printing process
Name of factory		
Address	Xiamen City.	,Xiamen,China

Details:
none

Non-compliance: NA

1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against customer code: ☐ NC against Local Law Local law and/or ETI /Additional Elements requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>
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Observation: NA	
Description of observation: Local law or ETI/Additional elements requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

Summary of sub-contracting – if applicable	
☐ Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	☒ Yes ☐ No Please describe: product quantity, product plan, sale order and purchasing order etc had been checked, no other sub-contracting was found.
B: If sub-contractors are used, is there evidence this has been agreed with the main client?	☒ Yes ☐ No If Yes , summarise details: Approved file by client of subcontractor can be provided at place.
C: Number of sub-contractors/agents used:	2

D: Is there a site policy on sub-contracting?	☒ Yes ☐ No If Yes , summarise details: the site policy on sub-contracting was established, it was same as ETI requirement.
E: What checks are in place to ensure no child labour is being used and work is safe?	The company conducted onsite evaluating to sub-contracting, the record can be provided at place.

Summary of homeworking – if applicable			
☒ Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No If Yes , summarise details:		
B: Number of homeworkers	Male:	Female:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents		If through agents, number of agents:
D: Is there a site policy on homeworking?	☐ Yes ☐ No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No Please give details:		
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No		

9: No Harsh or Inhumane Treatment is Allowed

[\(Click here to return to NC-table\)](#)

ETI

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

Additional elements:

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

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3 rd party?	☒ Yes ☐ No Please describe: Disciplinary practices have defined in Employees manual,
B: If Yes , are workers aware of these channels and have access? Please give details.	The interview workers know the channels.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Comment box, hotline
D: Which of the following groups is there a grievance mechanism in place for?	☒ Workers ☒ Communities ☒ Suppliers ☐ Other Details: one procedure was established. Suggestion box and they can communicate to their leader, trade union or worker representatives freely. Suppliers can communicate grievance mechanism to GM directly.
E: Are there any open disputes?	☐ Yes ☒ No If yes, please give details
F: Does the site encourage its business partners (e.g., suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. help lines or whistle blowing mechanism)	☒ Yes ☐ No If no, please give details
G: Is there a published and transparent disciplinary procedure?	☒ Yes ☐ No If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	☒ Yes ☐ No If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?

☐ Yes

☒ No

If yes, please give details

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:

There was no disciplinary practice record, but the monthly performance bonus evacuation included the factory rules and will degrade the performance bonus if violating the factory rule.

Training was provided to all workers. The training record can be kept well.

The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past.

There is an internal process for grievance, which is an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.

The duties of security guards were to protect safety of factory's property, to regularized entrance/exit of goods/ vehicles/ employees/ visitors.

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

Details:

Disciplinary practices have defined in Employees manual,

Any other comments:

none

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI

☐ NC against Local Law

☐ NC against customer

code:

Local law and/or ETI requirement:

Recommended corrective action:

Objective evidence

observed:

(where relevant please add photo numbers)

Observation: NA	
Description of observation: Local law or ETI requirement: Comments:	Objective evidence observed:

Good Examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

10. Other Issue areas: 10A: Entitlement to Work and Immigration

[\(Click here to return to NC-table\)](#)

Additional Elements

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

10A.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:

All employees have the copy of ID card, this means they all are entitled to work. No immigration employees.

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

Details:

Copies of ID card

Any other comments:

none

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

Local law and/or ETI /Additional Elements requirement:

Recommended corrective action:

Objective evidence observed:

(where relevant please add photo numbers)

Observation: NA

Description of observation: Local law or ETI/Additional Elements requirement: Comments:	Objective evidence observed:
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Good examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

10. Other issue areas 10B4: Environment 4-Pillar

[\(Click here to return to NC-table\)](#)

To be completed for a 4-Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.

10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.

10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements

10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.

10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.

10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).

10B4.7 Businesses shall make continuous improvements in their environmental performance.

10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation

10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.

10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

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 environmental testing report was reviewed, living waste water, air quality in workshop and noise were inspected and met the environmental requirements.

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

Details:

Construction project environmental influence report form; approved by Xiamen city, [REDACTED]

Environmental protection bureau on 14/08/2014;

Environmental testing report: test date –27 Aug., 2018;

Any other comments:
none

Non-compliance: NA

1. Description of non-compliance:

☐ NC against ETI/Additional Elements

☐ NC against Local

☐ NC against customer code:

Objective evidence observed:
(where relevant please add photo numbers)

Local law and/or ETI/Additional Elements requirement:

Recommended corrective action:

Observation: NA

Description of observation:

Local law or ETI/Additional elements requirements:

Comments:

Objective evidence observed:

Good examples observed: NA

Description of Good Example (GE):

Objective Evidence Observed:

Environmental Analysis <i>(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)</i>	
A: Is there a manager responsible for Environmental issues (Name and Position):	, ADM Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☒ Yes ☐ No Details: The risk rule was established and the risk assessment was conducted.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please detail.	☒ Yes ☐ No Details: ISO14001 system was gained. ISO14001, ICAS, 11718EU0060-05R0M, 2018-05-18~2021-05-17;
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	☒ Yes ☐ No If yes, is it publicly available? Yes, environmental policy was defined on employees manual and posted on workshop notice board.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	☒ Yes ☐ No Details: key impacts were recorded.
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	☐ Yes ☒ No
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please detail. <i>(For guidance, please see Measurement criteria)</i>	☐ Yes ☒ No Details: N/A
H: Have all legally required permits been shown? Please detail.	☒ Yes ☐ No Details: the local government permit can be provided.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☒ Yes ☐ No ☐ N/A Details: one chemical controlling procedure was established.
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	☒ Yes ☐ No Details: The HR department was charge of collecting the client's requirements and legislation, and transferred the requirement in the internal product standard.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	☒ Yes ☐ No Details: The factory had measured its impacts, including continuous recording and regular reviews

and discharge, waste, energy and green-house gas emissions	of use and discharge of natural resources e.g. energy use, water use. The relevant record can be provided.	
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☒ Yes ☐ No Details: the record was kept well.	
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards	☒ Yes ☐ No Details: the relevant procedure was established, and the record can be provided and verified.	
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☒ Yes ☐ No Details: the record was kept well. Facility had checked business partners operating on the premises have appropriate permits and licences and are conducting business in line with environmental expectations of the facility.	
Usage/Discharge analysis		
Criteria	Previous year: Please state period: 2018.1~12	Current Year: Please state period: 2019.1~4
Electricity Usage: Kw/hrs	427100	100000
Renewable Energy Usage: Kw/hrs	0	0
Gas Usage: Kw/hrs	0	0
Has site completed any carbon Footprint Analysis?	☐ Yes ☒ No	☐ Yes ☒ No
If Yes , please state result		
Water Sources: Please list all sources e.g. lake, river, and local water authority.	• local water authority • • •	• local water authority • • •
Water Volume Used: (m³)	6174	1630
Water Discharged: Please list all receiving waters/recipients.	• Municipal pipe • • •	• Municipal pipe • • •
Water Volume Discharged: (m³)	5556	1467

Water Volume Recycled: (m ³)	0	0
Total waste Produced (please state units)	73.92 kg	20.64 kg
Total hazardous waste Produced: (please state units)	0	0
Waste to Recycling: (please state units)	58.13 kg	15.94 kg
Waste to Landfill: (please state units)	15.79 kg	4.7 kg
Waste to other: (please give details and state units)	0	0
Total Product Produced (please state units)	35015674 PCS	1250065 PCS

10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to NC-table\)](#)

To be completed for a 4-Pillar SMETA Audit

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.

10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.

10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.

10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.

10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice.

10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics

10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

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:

Based on documents review and management interview, it was noted that the factory trained the staff whose job roles carry a higher level of risk e.g. sales, purchasing on Apr. of 2019.

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

Details:

Business ethics document, such as employee handbook, procedure and training requirement were established.

Training record can be kept well.

Any other comments:

none

Non-compliance: NA	
1. Description of non-compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local ☐ NC against customer code: Local law and/or ETI/Additional Elements requirement: Recommended corrective action:	Objective evidence observed: <i>(where relevant please add photo numbers)</i>

Observation: NA	
Description of observation: Local law or ETI/Additional elements requirement: Comments:	Objective evidence observed:

Good examples observed: NA	
Description of Good Example (GE):	Objective Evidence Observed:

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☒ Internal Policy ☒ Policy for third parties including suppliers Please give details: the policy was published.
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☒ Yes ☐ No Please give details: It was conducted on 15 Apr., 2019.

C: Is the policy updated on a regular (as needed) basis?	☒ Yes ☐ No Please give details: every year
D: Does the site require third parties including suppliers to complete their own business ethics training	☒ Yes ☐ No Please give details: the training was conducted.

Other Findings Outside the Scope of the Code

none

Community Benefits

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

none

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

☐ Not Applicable please x

NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.

Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.

ETI Code / Additional Elements

Customer's Supplier Code equivalent

0.A. Universal Rights covering UNGP

0.A. Universal Rights covering UNGP

0.A. Guidance for Observations

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.

0.B. Management Systems & Code Implementation

0.B. Management Systems & Code Implementation

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

Mondelēz International's Code of Conduct contains important rules we all must follow as we do business, and it describes the values that will guide us in our decisions. We all have to obey

0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	applicable laws, rules, and regulations. Also, we must follow our company policies, including those specific to a business unit, function, and location. Beyond that, the Code of Conduct sets out the ten most important rules that apply company-wide. Our Chief Compliance Officer oversees the company's compliance and integrity program, which addresses the issues covered by the Code of Conduct. The Code of Conduct is available on our public internet site, and is available on our company intranet site in several languages. We also have established Corporate Responsibility Expectations for Direct Suppliers, which we make available on our public internet site. These Expectations are an extension of the principles contained in our Code of Conduct, and we cover them through contract provisions that specifically incorporate our corporate responsibility expectations.
ETI 1. Forced Labour	ETI 1. Forced Labour
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.	Mondelēz International prohibits the use of forced labor in our operations, i.e., any work or service that a worker performs involuntarily, including under threat of physical harm or other penalty. <u>The Mondelēz International Statement on Human Rights</u> guides our approach. And, in line with the California Transparency in Supply Chains Act (SB 657), our website provides more detail on our efforts to help make a difference in our operations and those of our suppliers.
ETI 2. Freedom of association and the right to collective bargaining are respected	ETI 2. Freedom of association and the right to collective bargaining are respected
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.	We aim to have constructive relationships with our employees and their unions. Mondelēz International respects the interests of its employees to join (or not join) a union. In those situations where our employees have third-party representation, we will work with employee representatives in a direct and straightforward manner.

ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
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.	We use internal and external expertise to provide a safe work environment. Specifically, we: (i) provide safety training for all employees as required for their work; (ii) establish first aid and medical treatment procedures to provide employees with appropriate care; (iii) conduct careful investigations of accidents to avoid recurrence, and study the safety and health features of any new equipment, materials or process; and (iv) solicit employee involvement and support through safety committees or other avenues for employee input.
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
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.	Mondelēz International prohibits the unlawful employment or exploitation of children in our workplace. In accordance with the conventions of the International Labor Organization (ILO) and national laws, the minimum age for employment is the highest of the following ages: (i) 15 years of age, (ii) the local minimum employment age, or (iii) the mandatory schooling age. All temporary workers used by Mondelēz International and all third-party contractors who perform work on our premises are required to meet these minimum-age requirements.
ETI 5. Living wages are paid	ETI 5. Living wages are paid
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.	Except for collective bargaining at union represented facilities, we compensate employees competitively within the labor market and industries in which we compete; provide superior levels of compensation for superior performance; and focus rewards on individual contributions and business results. Further, we provide equal opportunity for advancement to all of our employees.

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.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <u>all</u> of the following are met: – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.	We are expected to, by company standards, adhere to local law, and employee negotiated labour and wage contracts, with regards to working hours, to ensure the safety and health of our employees while supporting our business demands.
ETI 7. No discrimination is practised	ETI 7. No discrimination is practised

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.	We prize a diverse and inclusive workplace and aim to promote cultural and individual differences. Mondelēz International does not discriminate in employment or employee treatment based upon any of the following characteristics: race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
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.	We are expected to, by company standards, adhere to local law, industry practices, and employee negotiated labour and wage contracts with regards to labour contracting, while supporting our business demands.
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking
8A.1 There should be no sub-contracting unless previously agreed with the main client.	

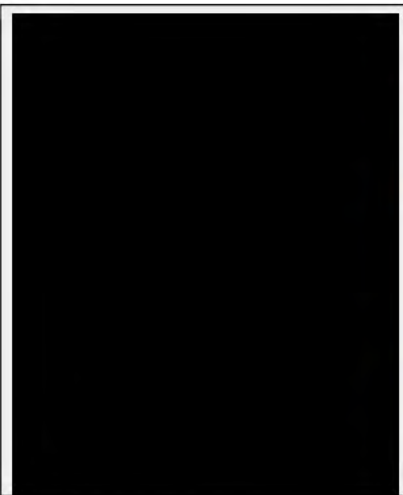
8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	Mondelēz International will not tolerate any form of harassment including harassment based on race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	We are expected to, by company standards, adhere to local law and applicable contracts with regards to contract labor.

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4-pillar audit report and audit checks for details).	We are expected to, by company standards, adhere to applicable laws. We work to continuously improve our environmental performance by setting and then working toward quantifiable goals that reduce the environmental impact of our activities.

10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.	
Business Practices Section	
10C. Compliance Requirements 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements. 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area. 10C. Guidance for Observations 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers. 10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-	We promote honesty and integrity in our business conduct by raising ethical awareness among our employees and providing direction and education on ethical issues. Further, we prohibit bribes, kickbacks, or and any other illegal inducements in business or government relationships. We expect employees to ask questions and raise concerns about business practices when they see something they think might be wrong. There may be times when employees are not comfortable speaking with their supervisors, compliance officers or human resources contacts, or simply wish to remain anonymous. Consistent with applicable local law, we have a toll-free and in some countries a collect call/reverse charge telephone HelpLine and an online version WebLine, so that our employees can confidentially and, if they wish, anonymously report instances of suspected wrongdoing or ask questions about compliance matters. Our HelpLine operates in more than 90 countries. As described on our public internet site, reports from people outside of the company of suspected wrongdoing may also be brought to our attention in four ways: (1) by mail; (2) by email; (3) through our HelpLine; and (4) through our WebLine.

compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.

Photo Form

		
Company building	Workshop 1	Workshop 2
		
Workshop 3	Workshop 4	Workshop 5
		
Workshop 6	warehouse	First aid box



Fire extinguisher



Fire hydrant



Fire alarm



Evacuation plan



Attendance system



Drink water boiler



Suggest box



Business licence



washroom



For more information visit: [Sedexglobal.com](https://www.sedexglobal.com)

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

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

[Click here for Buyer \(A\) & Buyer/Supplier \(A/B\) members:](http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

[Click here for Supplier \(B\) members:](http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d)

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

[Click here for Auditors:](https://www.surveymonkey.co.uk/r/BRTVCKP)

<https://www.surveymonkey.co.uk/r/BRTVCKP>



SMETA Corrective Action Plan Report (CAPR)

Version 6.0



Audit Details			
Sedex Company Reference: (only available on Sedex System)	ZC:	Sedex Site Reference: (only available on Sedex System)	ZS:
Business name (Company name):	Ltd		
Site name:	Ltd		
Site address: (Please include full address)	 Xiamen City , FUJIAN province, P R China	Country:	China
Site contact and job title:	Administration Dept. Manager		
Site phone:		Site e-mail:	
SMETA Audit Type Pillars:	☒ Labour Standards	☒ Health & Safety	☒ Environment ☒ Business Ethics
Date of Audit:	15 th to 16 th May, 2019 12 June, 2019(all NCs were closed by desktop verified.)		

Audit Company Name & Logo: Bureau Veritas 	Report Owner (payee): Ltd
--	-------------------------------------

Audit Conducted By					
Commercial	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	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 6.0 April 2017 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.

Any exceptions to this must be recorded here

(e.g. different sample size):

none

Auditor Team (s) (please list all including all interviewers):

Lead auditor:

ZHIHUA ZHU

Team auditor:

/

Interviewers:

ZHIHUA ZHU

Report writer:

ZHIHUA ZHU

Report reviewer:

Chitra Kawale

Audit Company Report Reference:

Date of declaration:

24th May, 2019

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.

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

Audit Parameters

Audit Parameters		
A: Time in and time out	Day 1 Time in: 9:00 Day 1 Time out: 20:00	Day 2 Time in: 9:00 Day 2 Time out: 20:00
B: Number of auditor days used:	1 auditor * 2.5 days = 2.5 man days on site and 0.5 man days off site	
C: Audit type:	☐ Full Initial ☒ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other If other, please define:	
D: Was the audit announced?	☒ Announced ☐ Semi – announced: Window detail: weeks ☐ Unannounced	
E: Was the Sedex SAQ available for review?	☒ Yes ☐ No If No, why not	
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If Yes , please capture detail in appropriate audit by clause	
G: Who signed and agreed CAPR (Name and job title)	Adm. Manager	
H: Is further information available (if yes, please contact audit company for details)	☐ Yes ☒ No	
I: Previous audit date:	5 th to 6 th June, 2018	
J: Previous audit type:	SMETA 4P	
K: Were any previous audits reviewed for this audit	☒ Yes ☐ No ☐ N/A	

Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
C: Present at the closing meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	NA		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	NA		

Corrective Action Plan

Corrective Action Plan – non-compliances (ETI Code)									
Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
08 Management systems Minor	New	Nearest internal audit was conducted on 19~20 April, 2018. But internal procedure required it should be conducted every one year.	☐ Training ☒ Systems ☐ Costs ☐ Lack of workers ☐ Other – please give details:	The company should conduct internal audit every year according to internal procedure.	30 days	Desktop	Adm. Manager	Desktop verification was conducted on 12 Jun., 2019. The company had conducted internal audit on the 20~21 May, 2019 and management review on the 23 May, 2019. The result can be accepted.	Closed
ETI3.1 Working Conditions are Safe and Hygienic Minor	New	Soap or hand washing was not provided at the washing room in the No. 3 floor production workshop.	☐ Training ☒ Systems ☐ Costs ☐ Lack of workers ☐ Other – please give details:	Soap or hand washing should be provided at the washing room in the production workshop.	30 days	Desktop	Adm. Manager	Desktop verification was conducted on 12 Jun., 2019. The company had provided hand washing on the washing room, the result can be accepted.	Closed

ETI 7: No Discrimination is Practiced Major		It was found one normal job was limited age on web employment advertisement.	☐ Training ☒ Systems ☐ Costs ☐ Lack of workers ☐ Other – please give details:	The company should not limit age on normal position.	30 days	Desktop	Adm. Manager	Desktop verification was conducted on 12 Jun., 2019. This web employment advertisement was updated and no limited age was found on the company's web employment.	Closed
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Corrective Action Plan – non-compliances (Local Law)

Non-Compliance Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new non-compliance identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Non-Compliance <i>Details of Non-Compliance</i>	Root cause <i>(completed by the site)</i>	Preventative and Corrective Actions <i>Details of actions to be taken to clear non-compliance, and the system change to prevent re-occurrence (agreed between site and auditor)</i>	Timescale <i>(Immediate, 30, 60, 90, 180, 365)</i>	Verification Method <i>Desktop / Follow-Up [D/F]</i>	Agreed by Management and Name of Responsible Person: <i>Note if management agree to the non-compliance, and document name of responsible person</i>	Verification Evidence and Comments <i>Details on corrective action evidence</i>	Status <i>Open/Closed or comment</i>
ETI3.1 Working Conditions are Safe and Hygienic Minor	New	The company did not provide regular health examination to three workers who contact noise on Double sewing process.	☐ Training ☒ Systems ☐ Costs ☐ lack of workers ☐ Other – please give details:	The company should provide health examination to all occupation position workers on time.	30 days	Desktop	Adm. Manager	Desktop verification was conducted on 12 Jun., 2019. The company had provided health examination to three workers who contact noise on double sewing process on the 20May, 2019. The test result can be accepted.	Closed

Corrective Action Plan – Observations				
Observation Number <i>The reference number of the observation from the Audit Report, for example, Discrimination No.7</i>	New or Carried Over <i>Is this a new observation identified at the follow-up or one carried over (C) that is still outstanding</i>	Details of Observation <i>Details of Observation</i>	Root cause <i>(completed by the site)</i>	Any improvement actions discussed <i>(Not uploaded on to SEDEX)</i>
		Nothing to Report		

Good examples

Good example Number <i>The reference number of the non-compliance from the Audit Report, for example, Discrimination No.7</i>	Details of good example noted	Any relevant Evidence and Comments
	Nothing to Report	

Confirmation

Please sign this document confirming that the above findings have been discussed with and understood by you: (site management)
If actual signatures are not possible in electronic versions, please state the name of the signatory in applicable boxes, as indicating the signature.

A: Site Representative Signature:

[REDACTED]

Title : Adm. Manager

Date :16 May, 2019

B: Auditor Signature:

Mr. Zhihua ZHU **Mr. Zhihua ZHU**

Title: Lead Auditor **Lead Auditor**

Date: 16 May, 2019 **12 June, 2019**

C: Please indicate below if you, the site management, dispute any of the findings. No need to complete D-E, if no disputes.

D: I dispute the following numbered non-compliances: NA

E: Signed:

(If any entry in box D, please complete a signature on this line)

NA

Title

Date

F: Any other site Comments: NA

Appendix 1

Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary." ☐ Not Applicable please x	
NOTE: The provisions of the ETI base Code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying the ETI Base Code are expected to comply with national and other applicable law and, where the provisions of law and the ETI Base Code address the same subject, to apply that provision which affords the greater protection.	Instruction to Audit Company: fill in the relevant clauses from the Customer Supplier Code - where applicable.
ETI Code / Additional Elements	Customer's Supplier Code equivalent
0.A. Universal Rights covering UNGP	0.A. Universal Rights covering UNGP
0.A. Guidance for Observations 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.B. Management Systems & Code Implementation	0.B. Management Systems & Code Implementation

0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.3 Suppliers are expected to communicate this Code to all employees. 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.	Mondelēz International's Code of Conduct contains important rules we all must follow as we do business, and it describes the values that will guide us in our decisions. We all have to obey applicable laws, rules, and regulations. Also, we must follow our company policies, including those specific to a business unit, function, and location. Beyond that, the Code of Conduct sets out the ten most important rules that apply company-wide. Our Chief Compliance Officer oversees the company's compliance and integrity program, which addresses the issues covered by the Code of Conduct. The Code of Conduct is available on our public internet site, and is available on our company intranet site in several languages. We also have established Corporate Responsibility Expectations for Direct Suppliers, which we make available on our public internet site. These Expectations are an extension of the principles contained in our Code of Conduct, and we cover them through contract provisions that specifically incorporate our corporate responsibility expectations.
ETI 1. Forced Labour	ETI 1. Forced Labour
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.	Mondelēz International prohibits the use of forced labor in our operations, i.e., any work or service that a worker performs involuntarily, including under threat of physical harm or other penalty. <u>The Mondelēz International Statement on Human Rights</u> guides our approach. And, in line with the California Transparency in Supply Chains Act (SB 657), our website provides more detail on our efforts to help make a difference in our operations and those of our suppliers.
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employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.	
ETI 3. Working conditions are safe and hygienic	ETI 3. Working conditions are safe and hygienic
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.	We use internal and external expertise to provide a safe work environment. Specifically, we: (i) provide safety training for all employees as required for their work; (ii) establish first aid and medical treatment procedures to provide employees with appropriate care; (iii) conduct careful investigations of accidents to avoid recurrence, and study the safety and health features of any new equipment, materials or process; and (iv) solicit employee involvement and support through safety committees or other avenues for employee input.
ETI 4. Child labour shall not be used	ETI 4. Child labour shall not be used
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.	Mondelēz International prohibits the unlawful employment or exploitation of children in our workplace. In accordance with the conventions of the International Labor Organization (ILO) and national laws, the minimum age for employment is the highest of the following ages: (i) 15 years of age, (ii) the local minimum employment age, or (iii) the mandatory schooling age. All temporary workers used by Mondelēz International and all third-party contractors who perform work on our premises are required to meet these minimum-age requirements.
ETI 5. Living wages are paid	ETI 5. Living wages are paid
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	Except for collective bargaining at union represented facilities, we compensate employees competitively within the labor market and industries in which we compete; provide superior levels of compensation for superior performance; and focus rewards on individual contributions and business results. Further, we provide equal opportunity for advancement to all of our employees.

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.	
ETI 6. Working Hours are not excessive	ETI 6. Working Hours are not excessive
6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards. 6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week. 6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay. 6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below. 6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <u>all</u> of the following are met: – this is allowed by national law; – this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce; – appropriate safeguards are taken to protect the workers' health and safety; and – The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies. 6.6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.	We are expected to, by company standards, adhere to local law, and employee negotiated labour and wage contracts, with regards to working hours, to ensure the safety and health of our employees while supporting our business demands.

ETI 7. No discrimination is practised	ETI 7. No discrimination is practised
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.	We prize a diverse and inclusive workplace and aim to promote cultural and individual differences. Mondelēz International does not discriminate in employment or employee treatment based upon any of the following characteristics: race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
ETI 8. Regular employment is provided	ETI 8. Regular employment is provided
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.	We are expected to, by company standards, adhere to local law, industry practices, and employee negotiated labour and wage contracts with regards to labour contracting, while supporting our business demands.
8A: Sub-Contracting and Homeworking	8A: Sub-Contracting and Homeworking

8A.1 There should be no sub-contracting unless previously agreed with the main client. 8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.	
ETI 9. No harsh or inhumane treatment is allowed	ETI 9. No harsh or inhumane treatment is allowed
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. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers	Mondelēz International will not tolerate any form of harassment including harassment based on race, color, religion, gender, age, ethnic or national origin, veteran status, disability, sexual orientation or preference, gender identity, marital status, citizenship status, genetic information, or any legally protected personal characteristic or status.
10. Other Issue areas: 10A: Entitlement to Work and Immigration	
Additional Elements 10A.1 Only workers with a legal right to work shall be employed or used by the supplier. 10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.	We are expected to, by company standards, adhere to local law and applicable contracts with regards to contract labor.

SMETA Extra Sections for 4 Pillar Audit:	SMETA Extra Sections for 4 Pillar Audit:
Environment Section	Environment Section
B.4. Compliance Requirements 10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards. 10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc. 10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements 10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers. 10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes. 10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g.	We are expected to, by company standards, adhere to applicable laws. We work to continuously improve our environmental performance by setting and then working toward quantifiable goals that reduce the environmental impact of our activities.

energy use, water use (see 4-pillar audit report and audit checks for details). 10B4.7 Businesses shall make continuous improvements in their environmental performance. 10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation 10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance. B4. Guidance for Observations 10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor. 10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.	
Business Practices Section	
10C. Compliance Requirements 10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice. 10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices. 10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements. 10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter. 10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice, 10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics 10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area. 10C. Guidance for Observations 10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.	We promote honesty and integrity in our business conduct by raising ethical awareness among our employees and providing direction and education on ethical issues. Further, we prohibit bribes, kickbacks, or and any other illegal inducements in business or government relationships. We expect employees to ask questions and raise concerns about business practices when they see something they think might be wrong. There may be times when employees are not comfortable speaking with their supervisors, compliance officers or human resources contacts, or simply wish to remain anonymous. Consistent with applicable local law, we have a toll-free and in some countries a collect call/reverse charge telephone HelpLine and an online version WebLine, so that our employees can confidentially and, if they wish, anonymously report instances of suspected wrongdoing or ask questions about compliance matters. Our HelpLine operates in more than 90 countries. As described on our public internet site, reports from people outside of the company of suspected wrongdoing may also be brought to our attention in four ways: (1) by mail; (2) by email; (3) through our HelpLine; and (4) through our WebLine.

10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented.	
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