



# Sedex Members Ethical Trade Audit Report

Version 6.1



Sedex Audit Reference: 2019CNZAA408138344

Audit Details			
Sedex Company Reference: (only available on Sedex System)	[REDACTED]	Sedex Site Reference: (only available on Sedex System)	[REDACTED]
Business name (Company name):	[REDACTED]		
Site name:	[REDACTED]		
Site address: (Please include full address)	[REDACTED] [REDACTED] [REDACTED] [REDACTED] Fujian Province [REDACTED] [REDACTED]	Country:	China
Site contact and job title:	[REDACTED] / HR & Admin Manager [REDACTED] / HR Supervisor		
Site phone:	[REDACTED] [REDACTED]	Site e-mail:	[REDACTED]
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health & Safety (plus Environment 2-Pillar)	<input type="checkbox"/> Environment 4-pillar <input type="checkbox"/> Business Ethics
Date of Audit:	July 3~4, 2019 October 16, 2019		

<b>Audit Company Name &amp; Logo:</b> ELEVATE 	<b>Report Owner (payer):</b> <i>(If paid for by the customer of the site please remove for Sedex upload)</i> [REDACTED]
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Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			



## Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 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): Nil

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

Lead auditor: Amanda He / Rony Le APSCA number: 21701250 / 21701029

Lead auditor APSCA status: Register / Registered auditor

Team auditor: Nil / Nil APSCA number: N/A / N/A

Interviewers: Amanda He / Rony Le APSCA number: 21701250 / 21701029

Report writer: Amanda He / Rony Le

Report reviewer: Iris Chen / Felix Tan

Date of declaration: July 10, 2019 / October 16, 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.*



## Summary of Findings

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	<a href="#">Universal Rights covering UNGP</a>			<input type="checkbox"/>	<input type="checkbox"/>		0	0	•
0B	<a href="#">Management systems and code implementation</a>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	•
1.	<a href="#">Freely chosen Employment</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
2	<a href="#">Freedom of Association</a>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
3	<a href="#">Safety and Hygienic Conditions</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	8	2	0	NC <ul style="list-style-type: none"> <li>Share site &amp; mixed use building</li> <li><b>Not Corrected</b> Shared building</li> <li>Missing evacuation plan</li> <li><b>Corrected</b></li> <li>Insufficient emergency light</li> <li><b>Corrected</b></li> <li>Missing exit sign</li> <li><b>Corrected</b></li> <li>Blocked safety exit</li> <li><b>Corrected</b></li> <li>Rolling door at safety exit</li> <li><b>Corrected</b></li> </ul>
			<input checked="" type="checkbox"/>			2	2		

									<ul style="list-style-type: none"> <li>Insufficient fire-extinguishers external inspection <b>Corrected</b></li> <li>Lacking smoke detector <b>Corrected</b></li> <li><b>New:</b> No safety eye-shield was installed</li> </ul> OB
4	<u>Child Labour</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
5	<u>Living Wages and Benefits</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	1 <b>1</b>	0	0	NC <ul style="list-style-type: none"> <li>Insufficient social insurance participation <b>Not Corrected</b> Insufficient social insurance</li> </ul>
6	<u>Working Hours</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		<input type="checkbox"/>	3 <b>0</b>	0	0	NC <ul style="list-style-type: none"> <li>Monthly overtime hours violation <b>Corrected</b></li> <li>Rest day violation <b>Corrected</b></li> <li>Weekly working hours violation <b>Corrected</b></li> </ul>
7	<u>Discrimination</u>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	0	0	0	
8	<u>Regular Employment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	



8A	<u>Sub-Contracting and Homeworking</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
9	<u>Harsh or Inhumane Treatment</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10A	<u>Entitlement to Work</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10B2	<u>Environment 2-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	0	
10B4	<u>Environment 4-Pillar</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	
10C	<u>Business Ethics</u>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NA	NA	NA	

#### General observations and summary of the site:

The site was established in 2018 and produces outdoor equipment (picnic bag, cooler bag, blanket). The business is owned and managed by [REDACTED] / General Manager. It consists of the 1<sup>st</sup> floor of [REDACTED] building (6-storey), the 1<sup>st</sup> & 3<sup>rd</sup> floor of Building 5# (3-storey), the 1<sup>st</sup>, 3<sup>rd</sup>~6<sup>th</sup> floor of [REDACTED] building (6-storey) and the 2<sup>nd</sup> floor of Service building (5-storey). One shed building was built next to 1F of [REDACTED] building with an area of 300 square meters. No kitchen/canteen/dormitory is available in the factory for employees.

The audit was performed over 2 days by 1 auditor and included interviews and records inspection of 26 workers.

Workers interviewed included both male and female. All workers were favourable towards the company.

Overall, there were 12 non-compliances and 2 Observations found during this audit. These were related to Safety and Hygienic Conditions (8 NCs 2OBs), Working Hours (3 NCs) and Wages & Benefits (1 NC). Issues such as missing evacuation plan, missing emergency light & exit sign etc. were noted.

Overall, there were 3 non-compliances and 2 Observations found during this audit. These were related to Safety and Hygienic Conditions (2 NCs, 2OBs), Living Wages and Benefits (1 NC). Issues such as no safety eye-shield was installed etc. were noted.

\*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:								
B: Site name:								
C: GPS location: (If available)	GPS Address:   Fujian Province, China	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 Number: Valid Date: From May 11, 2018 to May 10, 2068							
E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc	outdoor equipment (picnic bag, cooler bag, blanket)							
F: Site description: (Include size, location, and age of site. Also, include structure and number of buildings)	<p> is located at     Fujian Province, China. The total construction area occupied was approx. 15,929 square meters. The facility has operated in the existing location since 2018. It consists of the 1<sup>st</sup> floor of building (6-storey), the 1<sup>st</sup> &amp; 3<sup>rd</sup> floor of Building 5# (3-storey), the 1<sup>st</sup>, 3<sup>rd</sup>~6<sup>th</sup> floor of building (6-storey) and the 2<sup>nd</sup> floor of Service building (5-storey). One shed building was built next to 1F of building with an area of 300 square meters used as material storage and cutting section.. No kitchen/canteen/dormitory is available in the factory for employees.</p> <p>A total of 374 employees are currently working in the facility, which includes 346 production employees and 28 non-production employees. Around 74.5% employees migrant from other provinces, such as Chongqing, Guizhou, etc. All employees are permanent workers and hired by the facility directly.</p> <p>The employees work for 5 days a week in one shift. The normal working hour is from 07:30-16:30 with 1 hour for lunchtime from 12:00-13:00. Employees' wages are calculated in hourly rate. Wages are issued on 25th of each month by bank transfer. The peak or low season in this facility is not obvious.</p> <table border="1"> <thead> <tr> <th>building</th> <th>Description</th> <th>Remark, if any</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>		building	Description	Remark, if any			
building	Description	Remark, if any						



	1/F	Material warehouse	Nil
	2/F~6/F	On decoration	Not used by the auditee
	Is this a shared building?	Yes	Nil
	[REDACTED] building	Description	Remark, if any
	1/F	Preparation section (weaving/cutting)	Additional shed was built next to it as cutting section
	2/F	[REDACTED]	Mixed use floor
	3/F~4/F	Sewing/inspecting/packing sections	Nil
	5/F	Finished goods warehouse	Nil
	6/F	Sundry warehouse	Nil
	Is this a shared building?	Yes	2/F was used by [REDACTED]
	Building 5#	Description	Remark, if any
	1/F	Compounding section	Nil
	2/F	[REDACTED]	Mixed use floor
	3/F	Packing material warehouse	Nil
	Is this a shared building?	Yes	2/F was used by [REDACTED]
	Service building	Description	Remark, if any
	1/F	Reception floor	Not used by the auditee
	2/F	office	Nil
	3/F~4/F	office	Not used by the auditee
	5/F	Kitchen & canteen	Owned by [REDACTED]

	<table border="1"> <tr> <td data-bbox="655 210 874 315">Is this a shared building?</td><td data-bbox="874 210 1220 315">Yes</td><td data-bbox="1220 210 1485 315">The auditee only rented the 2<sup>nd</sup> floor</td></tr> </table> <p>Same as above except below:</p> <p>A total of 394 employees are currently working in the facility, which includes 354 production employees and 40 non-production employees. Around 74.1% employees were migrant from other provinces, such as Chongqing, Guizhou, etc. All employees are permanent workers and hired by the facility directly.</p> <p>For below, please add any extra rows if appropriate.</p> <p>F1: Visible structural integrity issues (large cracks) observed?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F2: Please give details: The facility building was in good condition.</p> <p>F3: Does the site have a structural engineer evaluation?  <input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No</p> <p>F4: Please give details: NA. The facility building was in good condition.          Same as above</p>	Is this a shared building?	Yes	The auditee only rented the 2 <sup>nd</sup> floor
Is this a shared building?	Yes	The auditee only rented the 2 <sup>nd</sup> floor		
G: Site function:	<input type="checkbox"/> Agent <input type="checkbox"/> Factory Processing/Manufacturer <input checked="" type="checkbox"/> Finished Product Supplier <input type="checkbox"/> Grower <input type="checkbox"/> Homeworker <input type="checkbox"/> Labour Provider <input type="checkbox"/> Pack House <input type="checkbox"/> Primary Producer <input type="checkbox"/> Service Provider <input type="checkbox"/> Sub-Contractor			
H: Month(s) of peak season: (if applicable)	Not obvious			
I: Process overview: (Include products being produced, main operations, number of production lines, main equipment used)	Main products: outdoor equipment (picnic bag, cooler bag, blanket) Main processes: weaving, cutting, compounding, sewing, inspecting, packing			
J: What form of worker representation / union is there on site?	<input type="checkbox"/> Union (name) <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None			



K: Is there any night production work at the site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
L: Are there any on site provided worker accommodation buildings e.g. dormitories	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes approx. % of workers in on site accommodation
M: Are there any off site provided worker accommodation buildings	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	<input type="checkbox"/> Yes <input type="checkbox"/> No If No, please give details: NA

Audit Parameters			
A: Time in and time out	Day 1 Time in: 09:00 Day 1 Time out: 16:40 Day 1 Time in: 09:30 Day 1 Time out: 17:40	Day 2 Time in: 09:00 Day 2 Time out: 15:30 Day 2 Time in: NA Day 2 Time out: NA	Day 3 Time in: NA Day 3 Time out: NA Same as above
B: Number of auditor days used:	1 auditor in 2 days 1 assessor in 1 day		
C: Audit type:	<input checked="" type="checkbox"/> Full Initial <input type="checkbox"/> Periodic <input type="checkbox"/> Full Follow-up <input checked="" type="checkbox"/> Partial Follow-Up <input type="checkbox"/> Partial Other If other, please define:		
D: Was the audit announced?	<input type="checkbox"/> Announced <input checked="" type="checkbox"/> Semi – announced: Window detail: 4 weeks <input type="checkbox"/> Unannounced Same as above		
E: Was the Sedex SAQ available for review?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If No, why not SAQ was not complete in Sedex system. Same as above		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	<input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, please capture detail in appropriate audit by clause: NA Same as above		
G: Who signed and agreed CAPR (Name and job title)	Ms. Lin Shan / Admin Same as above		
H: Is further information available (If yes, please contact audit company for details)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
I: Previous audit date:	Not provided July 3&4, 2019		
J: Previous audit type:	Not provided Initial		
K: Were any previous audits reviewed for this audit	<input type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		



Audit attendance	Management	Worker Representatives	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
B: Present at the audit?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
C: Present at the closing meeting?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
D: If Worker Representatives were not present please explain reasons why (only complete if no worker reps present)	N/A N/A		
E: If Union Representatives were not present please explain reasons why: (only complete if no union reps present)	No functional union in the factory. No functional union in the factory.		

## Worker Analysis

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

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	36 / 40	0	0	103 / 99	0	0	0	139 / 139
Worker numbers – female	41 / 44	0	0	166 / 171	0	0	0	207 / 215
Total	77 / 84	0	0	269 / 270	0	0	0	346 / 354
Number of Workers interviewed – male	2 / 2	0	0	7 / 3	0	0	0	9 / 5
Number of Workers interviewed – female	3 / 1	0	0	14 / 4	0	0	0	17 / 5
Total – interviewed sample size	5 / 3	0	0	21 / 7	0	0	0	26 / 10





A: Nationality of Management	China Same as above	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. <i>Please add more nationalities as applicable to site. Add more rows if required.</i>	Nationalities: B1: Nationality 1: China B2: Nationality 2: B3: Nationality 3: Same as above	Was the list completed during peak season? <input type="checkbox"/> Yes <input type="checkbox"/> No  If no, please describe how this may vary during peak periods: NA
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 100% C1: approx % total workforce: Nationality 2 C2: approx % total workforce: Nationality 3 Same as above	
D: Worker remuneration (management information)	D: % workers on piece rate D1: 100 % hourly paid workers D2: % salaried workers Same as above  Payment cycle: D3: % daily paid D4: % weekly paid D5: 100 % monthly paid D6: % other D7: If other, please give details Same as above	



Worker Interview Summary		
A: Were workers aware of the audit?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	
B: Were workers aware of the code?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	
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)	<b>4 groups of 5</b> <b>1 group of 4</b>	
D: Number of individual interviews (Please see SMETA Best Practice Guidance and Measurement Criteria)	D1: Male: 2  <b>Male: 3</b>	D2: Female: 4  <b>Female: 3</b>
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>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
G: In general, what was the attitude of the workers towards their workplace?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Favourable <input type="checkbox"/> Non-favourable <input type="checkbox"/> Indifferent	
H: What was the most common worker complaint?	Nil <b>Nil</b>	
I: What did the workers like the most about working at this site?	Nil <b>Nil</b>	
J: Any additional comment(s) regarding interviews:	Nil <b>Nil</b>	
K: Attitude of workers to hours worked:	Acceptable <b>Nil</b>	
L. Is there any worker survey information available?		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No L1: 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		



26 workers (17 females, 9 males) were selected from different departments including: weaving, cutting, compounding, sewing, inspecting and packing sections for confidential interviews. 6 workers were interviewed individually in workshops and 20 were interviewed in 4 groups of 5 to make them feel comfortable. In general, workers interviewed onsite seemed more related talking with auditor, while those who interviewed in office in group seemed a little nervous and provided very uniform and same answers to related questions. No negative feedback was collected.

10 workers (5 females, 5 males) were selected from different departments including: weaving, cutting, compounding, sewing, inspecting and packing sections for confidential interviews. 6 workers were interviewed individually in workshops and 4 were interviewed in 1 group to make them feel comfortable. In general, workers interviewed onsite seemed more related talking with auditor, while those who interviewed in office in group seemed a little nervous and provided very uniform and same answers to related questions. No negative feedback was collected.

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 attended the whole assessment process. They were open to auditor. They stated that they were elected by workers. Workers could raise suggestion or complaint through workers representative meeting. They would participate in grievance solution.

Same as above

O: Attitude of managers:

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

Factory management were cooperative with ELEVATE staff and provided full access to the whole facility. Management provided required documents and records in time, accompanied assessor with factory tour and helped select workers for interviews. Management staff attended the closing meeting, confirmed all the findings and signed on the CAPR without any argument.

Same as above



## Audit Results by Clause

### 0A: Universal Rights covering UNGP

[\(Click here to return to summary of findings\)](#)

#### 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 factory has established written policy and procedures to meet the human rights and labour standards required by local law and customers. [REDACTED] / HR & Admin Manager was responsible for compliance with the human rights to all appropriate parties, including its own suppliers. Through trainings, handbooks and postings at the facility.

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

##### Details:

- The written policy including human rights.
- Appointment book of person responsible for implementing standards concerning Human rights
- Factory rules
- Social compliance management handbook
- Training records of human rights
- Employee interview, employees could raise the human rights issues by suggestion box confidentially.

##### Any other comments:

Nil

Same as above



A: Policy statement that expresses commitment to respect human rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: the factory had a policy statement that express commitment to respect human rights.  Same as above
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Name: [REDACTED] Job title: HR & Admin Manager  Same as above
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: the factory had established a transparent system for confidentially reporting.  Same as above
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If no, please give details: N/A  Same as above
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: the effective data privacy procedure had posted in the workshop for workers review.  Same as above

Findings	
<p>Finding: Observation <input type="checkbox"/> Company NC <input type="checkbox"/></p> <p>Description of observation:</p> <p>None observed</p> <p>Local law or ETI/Additional elements / customer specific requirement:</p> <p>N/A</p> <p>Comments:</p> <p>N/A</p>	<p>Objective evidence observed:</p> <p>N/A</p>

Same as above	
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Good examples observed:	
Description of Good Example (GE): None observed  Same as above	Objective Evidence Observed: N/A



## 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)	A1: Last year: 2018 5 % Same as above	A2: This year: 2019 5.7 % Same as above
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1 <sup>st</sup> day of 90 day period + number of employees on the last day of the 90 day period) / 2]	2% Same as above	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(number of employees on 1 <sup>st</sup> day of the year + number employees on the last day of the year) / 2] * number available workdays in the year	C1: Last year: 2018 0.9 % Same as above	C2: This year: 2019 0.4 % Same as above
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1 <sup>st</sup> of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	0.38% Same as above	
E: Are accidents recorded?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: Please describe: Nil Same as above	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: 2018 Number: 0 Same as above	F2: This year: 2019 Number: 0 Same as above
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 Same as above	
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]	H1: Last year: 2018 0 Same as above	H2: This year: 2019 0 Same as above
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months 0 % workers Same as above	I2: 12 months 0 % workers Same as above



J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months 100 % workers 0 % workers	J2: 12 months 100 % workers 0 % workers
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### OB: Management system and Code Implementation

[\(Click here to return to summary of findings\)](#)

0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.  
0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with  
0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.  
0.B.4 Suppliers are expected to communicate this Code to all employees.  
0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

### Current Systems and Evidence Examined

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

#### Current systems:

The factory has established written policy and procedures to meet the Code and labour standards required by local law and customers. [REDACTED] / HR & Admin Manager was responsible for compliance with the Code implementation and the Code was communicated to all employees through trainings, handbooks and postings at the facility.

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

##### Details:

- Employee Handbook
- Business license
- Factory Manual contains details of Code and labour standards required by local law and customers.
- Training records of client code in on Apr 30, 2019

##### Any other comments:

Nil

Same as above

### 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 any fines/prosecutions for non-compliance to any regulations for 12 months.

Same as above



<p>B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: Factory established a policies and procedures that reduce the risk of forced labour, child labour, discrimination harassment &amp; abuse.  <b>Same as above</b></p>
<p>C: If Yes, is there evidence (an indication) of effective implementation? Please give details.</p>	<p>Factory had established written policy to prohibit forced labour, child labour, discrimination, harassment &amp; abuse. Furthermore, factory established investigation and grievance procedures to solve if any above issue occurred.  <b>Same as above</b></p>
<p>D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment &amp; abuse?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: Management and workers received training on the policy and procedure.  <b>Same as above</b></p>
<p>E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: Management and workers received training on the policy and procedure of prohibit forced labour, child labour, discrimination, harassment &amp; abuse once per year, with training records kept in place.  <b>Same as above</b></p>
<p>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).</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  F1: Please give details: NA  <b>Same as above</b></p>
<p>G: Is there a Human Resources manager/department? If Yes, please detail.</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: There were 2 staffs in HR department.  <b>Same as above</b></p>
<p>H: Is there a senior person / manager responsible for implementation of the code</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: [REDACTED] / HR &amp; Admin Manager was responsible for the implementation of the code.  <b>Same as above</b></p>
<p>I: Is there a policy to ensure all worker information is confidential?</p>	<p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe: the factory established a policy to ensure all workers information confidential.  <b>Same as above</b></p>



J: Is there an effective procedure to ensure confidential information is kept confidential?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe: the factory established an effective procedure to ensure confidential information to keep confidential. <b>Same as above</b>
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the risk assessment document had provided for review. <b>Same as above</b>
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the factory established the process <b>Same as above</b>
M: Does the facility have a policy/code which require labour standards of its own suppliers?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the factory had the policy / code posted on the wall that require labour standards of its own suppliers. <b>Same as above</b>
<b>Land rights</b>	
N: Does the site have all required land rights licenses and permissions (see SMETA Measurement Criteria)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: The facility had provided the valid land rights licenses such as construction approval document for review. <b>Same as above</b>
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?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: During management interview, the facility was aware of local and national and international laws and requirements with regards to Land Rights. <b>Same as above</b>
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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, how does the company obtain FPIC: The facility had set up the written policy and procedures to obtain the FPIC before land acquisition if applicable. <b>Same as above</b>
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Details: Nil



	Same as above
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A. No such situation happened in facility Same as above
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A. No such situation happened in facility Same as above

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  N/A

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b>  N/A

Good Examples observed:	
<b>Description of Good Example (GE):</b> Nil	<b>Objective evidence observed:</b> N/A

Same as above



## 1: Freely Chosen Employment

[\(Click here to return to summary of findings\)](#)

### 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:

The factory has established hiring policy and hiring procedures in place. Factory management was familiar with local law regarding prison labour, deposit and wages deductions etc. Workers are not required to stay at the factory if they do not want to, and overtime is voluntary as well. No deposits or any original ID are required to be detained during employment. Resignation is free and wages are paid to resigned workers on time after reasonable notice (usually 30 days in advance).

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

#### Details:

- The facility's policy to ensure employment is freely chosen was reviewed. The policy includes the following clause: the facility does not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; there is no forced, bonded or involuntary prison labour; and employees are free to leave their employer after reasonable notice.
- Labour contracts with notice periods
- Training of forced, bonded or involuntary prison labour for all employees at the time employee, and re-fresh training was conducted once per year for all employees. The latest training was on Mar 20, 2019.
- As per workers interview, it was noted that they are free to leave their working stations once their shifts end; all overtime workings were voluntary; and they are not required to pay any 'deposits' or leave their ID cards.

#### Any other comments:

Nil

Same as above

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 worker affected

Same as above

B: Is there any evidence of a loan scheme in operation

☐ Yes

☒ No



	Please describe finding: Nil Same as above
C: Is there any evidence of retention of wages /deposits	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes please give details and category of workers affected: <input checked="" type="checkbox"/> Not applicable Same as above
D: Are there any restrictions on workers' freedom to terminate employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Same as above
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement'?	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details and category of workers affected: <input checked="" type="checkbox"/> Not applicable Same as above
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please describe finding: Same as above
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, please give details and category of workers affected: Related policy was established to identify and avoid such situation. <input type="checkbox"/> Not applicable Same as above
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe finding: Training was provided to management about above policy. Same as above

Non-compliance:



<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law: <input type="checkbox"/> NC against customer code:  None observed  <b>Local law and/or ETI requirement</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i>  N/A
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Observation:	
<b>Description of observation:</b> None  <b>Local law or ETI requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> Nil

Good Examples observed:	
<b>Description of Good Example (GE):</b> None  Same as above	<b>Objective evidence observed:</b> N/A

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

[\(Click here to return to summary of findings\)](#)

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

### ETI

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

### Current Systems and Evidence Examined

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

#### Current systems:

Currently, there's one worker committee existing in the factory. All employees have the right to join worker committee. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. The workers could raise any issue or express their concerns through suggestion box. There was a relevant written policy / procedure documented in place. The meeting between with factory management and worker committee representatives was conducted annually.

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

##### Details:

- Written freedom of association procedure was established in the factory, which recognized and respected the right of employees to exercise their lawful right of free association.
- Employee handbook stated that employees are free to form worker committee. Nobody will be treated differently whether they are members of worker committee.
- The record from the suggestion box and what relevant actions have been taken was reviewed. Facility management commented that they collect the suggestions from the suggestion box and review them in the management meeting once a month. If agreed, they will take the relevant actions to improve.
- There were total 3 committee representatives elected in the factory. The lasted meeting records between facility management and worker committee representatives (conducted on June 11, 2019) were provided to review.

##### Any other comments:

Nil

Same as above



A: What form of worker representation/union is there on site?	<input type="checkbox"/> Union (name): <input checked="" type="checkbox"/> Worker Committee <input type="checkbox"/> Other (specify) <input type="checkbox"/> None <b>Same as above</b>	
B: Is it a legal requirement to have a union?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>Same as above</b>	
C: Is it a legal requirement to have a worker's committee?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>Same as above</b>	
D: Is there any other form of effective worker/management communication channel? (Other than union/worker committee e.g. H&S, sexual harassment)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Describe: Suggestion box or direct communication with committee representatives  Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the supplier had provided meeting room for the worker committee to conduct the related business. <b>Same as above</b>	
F: Name of union and union representative, if applicable:		Is there evidence of free elections? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <b>Same as above</b>
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	Worker committee <b>Same as above</b>	Is there evidence of free elections? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <b>Same as above</b>
H: Are all workers aware of who their representatives are?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	
I: Were worker representatives freely elected?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	Date of last election: December 13, 2018 <b>Same as above</b>
J: Do workers know what topics can be raised with their representatives?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>	
K: Were worker representatives/union representatives interviewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If <b>Yes</b> , please state how many: 1 out of 3 committee representatives was interviewed <b>1 out of 3 worker representatives was interviewed;</b>	

<p>L: Please describe any evidence that union/worker's committee is effective? Specify date of last meeting; topics covered; how minutes were communicated etc.</p>	<p>Periodic meeting was conducted by committee representatives, the latest meeting was conducted on June 11, 2019 for periodic meeting. Periodic meeting was conducted by committee representatives, the latest meeting was conducted on September 11, 2019 for periodic meeting.</p>	
<p>M: Are any workers covered by Collective Bargaining Agreement (CBA)?</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Same as above</p>	
<p>If <b>Yes</b>, what percentage by trade Union/worker representation</p>	<p>___% workers covered by Union CBA N/A Same as above</p>	<p>___% workers covered by worker rep CBA</p>
<p>M3: If <b>Yes</b>, does the Collective Bargaining Agreement (CBA) include rates of pay?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A Same as above</p>	

Non-compliance:	
<p><b>1. Description of non-compliance:</b>  <input type="checkbox"/> NC against ETI    <input type="checkbox"/> NC against Local Law    <input type="checkbox"/> NC against customer code:  None observed</p> <p><b>Local law and/or ETI requirement:</b>  N/A</p> <p><b>Recommended corrective action:</b>  N/A</p> <p>Same as above</p>	<p><b>Objective evidence observed:</b>  <i>(where relevant please add photo numbers)</i></p> <p>N/A</p>

Observation:	
<p><b>Description of observation:</b>  None</p> <p><b>Local law or ETI requirement:</b>  N/A</p> <p><b>Comments:</b>  N/A</p> <p>Same as above</p>	<p><b>Objective evidence observed:</b>  N/A</p>



Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
None	N/A
Same as above	

### 3: Working Conditions are Safe and Hygienic

[\(Click here to return to summary of findings\)](#)

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

#### 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:

The facility generally provided an adequate work environment and maintains a comfortable temperature throughout. The electrical system was in a good condition. All switches in the electrical control panels were properly covered. The facility has provided enough fire extinguishers / fire hydrants in all working sections. A functional fire alarm can be found in the facility. The facility's policy and procedures were communicated through the notice board in the local language. Drinking water was provided and installed in workshops. Sufficient and proper supplies/items were stocked in all of the first aid kits. However, the fire safety condition should be enhanced in workshops. Some NCs (i.e. missing exit sign/emergency light/evacuation plans, etc.) were detected.

During the follow up audit, some previous non-compliances were corrected, such as exit sign etc. however, 2 NCs were still noted, such as no safety eye-shield. Refer to below for details.

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

##### Details:

- Fire-fighting equipment inspection and maintenance records
- Fire safety approval/registration
- Construction safety approval
- PPE training
- License for special operation
- Registration of special equipment
- Inspection certificate of special equipment
- Certificate of special equipment operator
- Fire drill records
- Drinking water testing report
- Interviews with EHS manager

#### Any other comments:

Nil



Same as above

<p>A: Does the facility have general and occupational Health &amp; Safety policies and procedures that are fit for purpose and are these communicated to workers?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Please give details: the factory had established the general Health &amp; Safety and occupational Health &amp; Safety policies and procedures, and they posted on the workshop for workers review.</p> <p>Same as above</p>
<p>B: Are the policies included in workers' manuals?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: the workers' manual had included the relate policies.</p> <p>Same as above</p>
<p>C: Are there any structural additions without required permits/inspections (e.g. floors added)?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details: Nil</p> <p>Same as above</p>
<p>D: Are visitors to the site informed on H&amp;S and provided with personal protective equipment</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: PPE were provided when enter to workshop</p> <p>Same as above</p>
<p>E: Is a medical room or medical facility provided for workers?</p> <p>If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details: Nil</p> <p>Same as above</p>
<p>F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Details: first aider was available in the factory</p> <p>Same as above</p>
<p>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?</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p>Details: Nil</p> <p>Same as above</p>



H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	<input type="checkbox"/> Yes <input type="checkbox"/> No Please give details: N/A no dormitory in the factory. <b>Same as above</b>
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Details: the factory had made the H & S risk assessment to evaluating the arrangements for workers doing overtime. <b>Same as above</b>
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe As per document review, the facility had obtained the EIA report/approval and EPCA. <b>Same as above</b>
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please describe As per document review, the facility had established procedure to identify the environmental impact of production. <b>Same as above</b>

### Non-compliance:

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

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

It was noted that there were another company [REDACTED] (short as [REDACTED]) located in same premier or shared the same building with the auditee, both companies were under the same group company [REDACTED]. The auditee was a manufacturing factory, while [REDACTED] focus on [REDACTED]. Both companies had independent business license and management under different management. No worker exchanged between the auditee and other company.  
The auditee rented 6-storey of [REDACTED] (1/F, 3/F~6/F) as workshop and warehouse, 6-storey of [REDACTED] (1/F) as warehouse, 3-storey of Building 5# (1/F, 3/F) as workshop and warehouse, 5-storey of Service building (2/F as office) from the landlords (also branch companies under [REDACTED]), while [REDACTED] used the 2nd floor of [REDACTED] & 2nd floor of Building 5# as a commercial education area. For [REDACTED] 2/F-6/F were on

#### 1. Objective evidence observed:

Per factory tour, management interview  
Refer to photo 23-25  
**Per factory tour, management interview**  
**Refer to photo 22-26**



decoration. According to management representation, these floors would be leased as office floors after final decoration. The auditee only rented the 2nd floor of the service building as office building, one canteen was found on the 5th floor, which was claimed to belong to [REDACTED] the auditee did not use the canteen.

Factory walk through was accompanied by factory management to shared buildings. Per factory tour, there was no central panel for fire alarm or PA system in all buildings. No sprinkler system was installed in those buildings. Smoke detector was only installed in material warehouse on 1st floor of [REDACTED] one smoke detector was installed in finished goods warehouse on the 5th floor of [REDACTED] Joint fire drill was conducted twice per year with [REDACTED] who shared [REDACTED] with the auditee. During the factory walkthrough, missing safety exit sign & emergency light was detected on the 2nd floor of [REDACTED]

Current status: **Not Corrected.**

It was noted that there were another company [REDACTED] (short as [REDACTED]) located in same premier or shared the same building with the auditee, both companies were under the same group company [REDACTED] The auditee was a manufacturing factory, while [REDACTED] focus on camp education. Both companies had independent business license and management under different management. No worker exchanged between the auditee and other company.

The auditee rented 6-storey of [REDACTED] (1/F, 3/F~6/F) as workshop and warehouse, 6-storey of [REDACTED] (1/F) as warehouse, 3-storey of Building 5# (1/F, 3/F) as workshop and warehouse, 5-storey of Service building (2/F as office) from the landlords (also branch companies under [REDACTED]), while [REDACTED] used the 2nd floor of [REDACTED] & 2nd floor of Building 5# as a commercial education area. For [REDACTED] 2/F-6/F were under decoration. According to management representation, these floors would be leased as office floors after final decoration. The auditee only rented the 2nd floor of the service building as office areas, one canteen was found on the 5th floor, which was claimed to belong to [REDACTED] the auditee did not use the canteen.

Factory walk through was accompanied by factory management to shared buildings. Per factory tour, there was no central panel for fire alarm or PA system in all buildings. No sprinkler system was installed in those buildings. Smoke detectors were installed on each floor of the production buildings. Joint fire drill was conducted twice per year with [REDACTED] who shared [REDACTED] with the auditee.

#### Local law and/or ETI requirement

In accordance with 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.

client requirement, Multi-tenancy (more than one tenant in an area) without permission from the Director for [REDACTED]

#### Recommended corrective action:

It is recommended that the factory should not share buildings with other factory or company.



## 2. Description of non-compliance:

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

It was noted that no evacuation plan was posted in shed building near 1F of [REDACTED]

Current status: **Corrected.**

It was noted that evacuation floor plan was posted in the shed building near 1F of [REDACTED]

### Local law and/or ETI requirement

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:

It is recommended that the factory should post evacuation maps in each fire protection area as ETI code

## 2. Objective evidence observed:

Per factory tour

Per factory tour, management interview

Refer to photo 34

## 3. Description of non-compliance:

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

It was noted that insufficient emergency light was installed to light up following areas:

1) evacuation routes & one safety exit in city camp on the 2nd floor of [REDACTED]

2) shed building near 1F of [REDACTED]

Current status: **Corrected.**

It was noted that safety emergency lights were installed in the factory, including following areas:

1) evacuation routes & one safety exit in city camp on the 2nd floor of [REDACTED]

2) 2 out of 2 emergency exits in the shed building of [REDACTED]

### Local law and/or ETI requirement

In accordance with Fire Safety of Building Design Regulation (GB50016-2014) article 10.3.1, the following portions of the civil building (other than residential building with height less than 27m), factory building and Class C storage shall be provided with emergency lighting fixtures:

1. Enclosed staircase, smoke proof staircase and its lobby, the lobby or combined lobby of fire lift shaft, fire-protection evacuation and refuge floors (refuge rooms);
2. Auditorium, Exhibition hall, multi-functional hall and assembly occupancies such as business hall, dinning hall and twelve studio with building area over 200m<sup>2</sup>;
3. The common activity space with building area over 300m<sup>2</sup> of the underground, semi-underground building;
4. The exit passageway of public building.
5. Production areas and evacuation passageway of personnel-intensive production buildings.

## 3. Objective evidence observed:

Per factory tour

Refer to photo 26-27

Per factory tour

Per factory tour

Refer to photo 30-32



Fire Safety of Building Design Regulation article 10.3.4, emergency lights shall be installed on the top of exits, the upper part of walls or the ceilings; back-up emergency lights shall be installed on the upper part of walls or ceilings.

#### Recommended corrective action:

It is recommended that the factory should install emergency lights at the above areas. Management has to undertake regular checks on these emergency lights to ensure that they are fully operational at all times.

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

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

It was noted that no exit sign was affixed on safety exits in following areas:

- 1) 3 out of 3 safety exits in mezzanine in material warehouse on the 1st floor of Hexie building;
- 2) 1 out of 2 safety exits in recombination section on the 1st floor of building 5#;
- 3) 2 out of 2 safety exits in shed building near 1F of [REDACTED];
- 4) 1 out of 3 safety exits on the 2nd floor of [REDACTED].

Current status: **Corrected.**

It was noted that exit signs were installed in the following areas:

- 1) 3 out of 3 safety exits in mezzanine in material warehouse on the 1st floor of [REDACTED];
- 2) 2 out of 2 safety exits in recombination section on the 1st floor of building 5#;
- 3) 2 out of 2 safety exits in shed building near 1F of [REDACTED];
- 4) 3 out of 3 safety exits on the 2nd floor of [REDACTED].

#### Local law and/or ETI requirement

In accordance with Fire Safety of Building Design Regulation (GB50016-2014) article 10.3.5, evacuation powered signs should be set in public buildings, residential buildings with the height more than 54m, high-rise production buildings (warehouses) and A, B, C-type single-storey or multiple-storey production buildings, and the following provisions should be followed:

1. Shall be set above safety exits and evacuation doors of assembly occupancies;
2. The evacuation indicating sign along the exit passageway shall be installed on the wall surface along the exit passageway and the corner where its distance to the floor shall be less than 1.0m, and the spacing of the indicating signs shall not be over 20m. For pocket-shaped passageway, the spacing shall not be over 10m. At the corner of the passageway, the spacing shall not be over 1.0m.

#### Recommended corrective action:

It is recommended that powered exit signs should be affixed on the emergency exits of above areas, the factory should provide proper fire safety training to workers, conduct regular health & safety inspection.

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

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

It was noted that 1 out of 2 safety exits in compounding section on the 1st floor of Building 5# was fully blocked by sundries, besides, the factory did not pull up the rolling door installed at this safety exit.

#### 4. Objective evidence observed:

Per factory tour  
Refer to photo 28-31  
Per factory tour  
Refer to photo 28-32

#### 5. Objective evidence observed:

Per factory tour  
Refer to photo 31  
Per factory tour  
Refer to photo 32, 35



Current status: **Corrected.**

It was noted that: 1. locking device was installed to the rolling door; besides, one iron doorsill was installed underneath to keep the rolling door open during working hours; 2. all emergency exits were freely accessible during this audit.

#### Local law and/or ETI requirement

In accordance with PRC Fire Prevention Law article 16(4), government offices, social groups, enterprises, public institutions and other entities shall take the following fire safety precautions: Ensure that evacuation passages, safety exits and fire truck passages are clear, and the fire and smoke compartmentalization and fire protection spacing meet applicable technical standards.

#### Recommended corrective action:

It is recommended that the factory should ensure that all safety exits are free of obstruction.

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

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

It was noted that 1 out of 2 safety exits in compounding section on the 1st floor of Building 5# was rolling door (no locking device).

Current status: **Corrected.**

It was noted that the locking device was installed to the rolling door on the 1F of the production building 5#, besides, another exit was installed which keep the rolling door opening during working hours.

#### Local law and/or ETI requirement

In accordance with Fire Safety of Building Design Regulation (GB50016-2014) article 6.4.11, evacuation doors in the building shall conform to the following requirements:

1. Evacuation doors of civil buildings and factory buildings shall be flush doors and opened to the direction of evacuation, shall not use pulling and pushing doors, rolling doors, hanging doors and revolving doors. Except factory buildings of class A and B, those rooms that contain no more than 60 persons in a room and the average evacuation capacity for each door of the rooms is not more than 30 persons there is no limitation in opening direction of the doors.
2. Doors of warehouses shall be flush doors open outward. Pulling and pushing doors or rolling doors may be set up on the exterior side of walls on the first floor of class C, D and E warehouses.
3. When the doors towards evacuation stairs or staircases opened completely, it shall not reduce the effective width of stair landing.
4. Evacuation doors in densely populated sites where personnel is controlled to enter or exit at the usual time, or the outside doors of residential buildings installed with access control systems shall be ensured that they are easy to open from inside without any tools like a key in case of fire, and signs and tips for use shall be set up on the remarkable position.

#### Recommended corrective action:

It is recommended that the factory should identify the requirements related to the emergency doors, provide proper fire safety training to workers, conduct regular health & safety inspection, re-install all factory doors to be open in the direction of evacuation.

#### 6. Objective evidence observed:

Per factory tour

Refer to photo 31

Per factory tour

Refer to photo 32, 35



## 7. Description of non-compliance:

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

It was noted that the maintenance for 4 fire extinguishers (dry powder extinguishers) in material warehouse in 1F of [REDACTED] had been expired in July 2018.

Current status: **Corrected.**

It was noted that factory had conducted comprehensive check for the fire extinguishers and replaced those expired ones. 8 out of 8 randomly selected fire extinguishers were maintained externally in May 2019.

### Local law and/or ETI requirement

In accordance with Code for Acceptance and Inspection of Extinguisher Distribution in Buildings (GB50444-2008), article 5.3.2, the maintenance period of extinguishers should be follow the requirement in tab 5.3.2.

### Recommended corrective action:

It is recommended that the factory should conduct maintenance work for those fire extinguishers according to the requirement of national standard.

## 7. Objective evidence observed:

Per factory tour  
Refer to photo 32

Per factory tour  
Refer to photo 33

## 8. Description of non-compliance:

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

It was noted that only one smoke detector was installed in finished goods warehouse on the 5th floor of [REDACTED] (2093 square meters per floor). Besides, no smoke detector was installed in sundry warehouse on the 6th floor of [REDACTED]

Current status: **Corrected.**

It was noted that sufficient smoke detectors were installed at each fire compartment on 5F, 6F of the [REDACTED]

### Local law and/or ETI requirement

In accordance with client requirement, Fire detectors are working and located so that they provide early warning of fire.

### Recommended corrective action:

It is recommended that the factory should install smoke detector in above areas as client requirement.

## 8. Objective evidence observed:

Per factory tour  
Refer to photo 33

Per factory tour  
Refer to photo 18-21

### New NC:

## 9. Description of non-compliance:

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

It was noted that no safety eye-shields were installed to 3 out of 5 randomly selected bar tacking sewing machines on the 4F of the [REDACTED]

### Local law and/or ETI requirement

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices.

## 9. Objective evidence observed:

Per factory tour  
Refer to photo 27



**Recommended corrective action:**

It is recommended that the factory should provide proper Health & Safety training to workers, conduct regular Health & Safety inspection equip safety eye-shield for all bar tacking sewing machines to comply with the law. The factory shall develop and implement procedures to reduce or eliminate the risk of an injury from moving machinery parts.

**Observation:**
**1. Description of observation:**

It was noted that no PA system was available in the factory.

Current status: **Not Corrected.**

It was noted that no PA system was available in the factory.

**Local law and/or ETI requirement**

In accordance with client requirement, in buildings over two stories - there is a means of communicating between floors (PA system or walkie-talkies - no mobile phones).

**Recommended corrective action:**

It is recommended that the factory should install PA system as client requirement.

**Objective evidence**
**observed:**

Per factory tour & management interview

Per factory tour & management interview

**2. Description of observation:**

It was noted that the factory did not have central panel for fire alarm.

Current status: **Not Corrected.**

It was noted that the factory did not have central panel for fire alarm.

**Local law and/or ETI requirement**

In accordance with client requirement, in buildings over two stories, fire detectors are mains powered and linked to zoned control panel. The audible alarm is mains powered and link to the fire detectors.

**Recommended corrective action:**

It is recommended that the factory should install central panel as client requirement.

**Objective evidence**
**observed:**

Per factory tour & management interview

Per factory tour & management interview

**Good Examples observed:**
**Description of Good Example (GE):**

None

Same as above

**Objective Evidence**
**Observed:**

N/A



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

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

##### ETI

4.1 There shall be no new recruitment of child labour.

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

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

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

#### Current Systems and Evidence Examined

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

##### Current systems:

The factory would verify all workers' original ID cards at the time of recruitment and keep the photocopies of ID cards in the personnel files. All employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth. Hiring procedure and related protection policy of young workers were also kept in place. No child labour or juvenile workers was working at the factory currently.

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

##### Details:

- Personal file
- Roster of employees
- Management and employee interview

##### Any other comments:

Nil

Same as above

A: Legal age of employment:	16 16
B: Age of youngest worker found:	19 19
C: Are there children present on the work floor but not working at the time of audit?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
D: % of under 18's at this site (of total workers)	0 % / 0%

E: Are workers under 18 subject to hazardous work assignments?  
[\(Go to clause 3 – Health and Safety\)](#)

☐ Yes  
☐ No  
 E1: If yes, give details: N/A

Same as above

#### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code:  
 None observed

Local law and/or ETI requirement:  
 N/A

Recommended corrective action:  
 N/A

Same as above

Objective evidence observed:  
 N/A

#### Observation:

Description of observation:  
 None

Local law or ETI requirement:  
 N/A  
 Comments:  
 N/A

Same as above

Objective evidence observed:  
 N/A

#### Good Examples observed:

Description of Good Example (GE):  
 None

Same as above

Objective Evidence Observed:  
 N/A



## 5: Living Wages are Paid

[\(Click here to return to summary of findings\)](#)

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

### 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:

Written wage & benefits policy (involved relevant local law regarding MW, OT wage and social insurance policy, paid annual leave, sick leave etc.) in place stated in the social compliance management manual which had clearly been communicated to all workers via labour contracts, factory rules (covered disciplinary measures policy / deductions from wages) posting and training etc.

During this assessment, the factory provided 12 months' payrolls (from June 2018 to May 2019) for assessor's review. As per factory management and provided payrolls, wages for all workers were calculated on hourly-rated basis and paid by bank transfer on 25th of each month. Based on provided payrolls and time attendance records, the hourly wage was RMB 9.78, which was above to the local legal minimum wage standard of RMB 9.77 per hour since July 1, 2017. And overtime wage paid at 150%, 200%, 300% of normal rate for overtime hours on normal days, weekends and holidays respectively. The total paid wages ranged from RMB 3947 to RMB 4865 per month. The gap between reported wages and legal requirements was nil and the percentage of workers being paid below the minimum wage was nil. For social insurance, a total of 374 employees in June 2019, including 374 employees were eligible to receive five types of social insurances. Through review of social insurance enrolment list, only 303 employees were enrolled these 5 types of insurance of pension insurance, medical insurance, Unemployment insurance, child-bearing insurance and occupational injury insurance.

Remark: The factory had bought the commercial insurance to all 158 employees (included those who were not enrolled in social insurance) with the valid period from April 25, 2019 to April 24, 2020. The aforesaid commercial insurance includes 1) Group Accident Insurance with a coverage of RMB 18,960,000, 2) Group Critical Illness Insurance with a coverage of RMB 1,580,000. A wage slip detailing: basic wage, working hours, OT hours, overtime wage, allowance, bonus, net wage, etc. was provided to each worker.

During this assessment, the factory provided 3 months' payrolls (from June 2019 to August 2019) for assessor's review. As per factory management and provided payrolls, wages for all workers were calculated on hourly-rated basis and paid by bank transfer on 25th of each month. Based on provided payrolls and time attendance records, the hourly wage was RMB 9.78, which was above the local legal minimum wage standard of RMB 9.77 per hour since July 1, 2017. And overtime wage paid at 150%, 200%, 300% of normal rate for overtime hours on normal days, weekends and holidays respectively. The total paid wages ranged from RMB 3131 to RMB 3793 per month. The gap between reported wages and legal requirements was nil and the percentage of workers being paid below the minimum wage was nil. For



social insurance, a total of 394 employees in September 2019, and all of them were eligible to receive five types of social insurances, but only 304 employees were enrolled in 5 types of insurance.

Remark: The factory had bought the commercial insurance to 158 employees (included those who were not enrolled in social insurance) with the valid period from April 25, 2019 to April 24, 2020.

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

Details:

- Employee handbook
- Wages and benefits policy
- Annual leave records
- Resigned workers payroll records
- Past 12 months payroll and 14 months' time records
- Social insurance and payment receipts

- Leave records
- Past 3 months payroll and 5 months' time records
- Social insurance and payment receipts
- Production records

Any other comments:

Nil

Nil

### Non-compliance:

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

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

It was noted that there was a total of 374 employees in June 2019, including 374 employees were eligible to receive five types of social insurances. Through review of social insurance enrolment list, only 303 employees were enrolled these 5 types of insurance of pension insurance, medical insurance, Unemployment insurance, child-bearing insurance and occupational injury insurance.

Remark: The factory had bought the commercial insurance to all 158 employees (included those who were not enrolled in social insurance) with the valid period from April 25, 2019 to April 24, 2020. The aforesaid commercial insurance includes 1) Group Accident Insurance with a coverage of RMB 18,960,000, 2) Group Critical Illness Insurance with a coverage of RMB 1,580,000.

**Current status: Not Corrected.**

It was noted that there was a total of 394 employees in September 2019, and all of them were eligible to receive five types of social insurances. Through review of social insurance enrolment list, only 304 employees were enrolled in 5 types of insurance, which were pension insurance, medical insurance, Unemployment insurance, child-bearing insurance and occupational injury insurance.

Remark: The factory had bought the commercial insurance to 158 employees (included those who were not enrolled in social insurance) with the valid period from April 25, 2019 to April 24, 2020. The aforesaid commercial insurance includes 1) Group Accident Insurance with a coverage of RMB 120,000, 2) Group Critical Illness Insurance with a coverage of RMB 10,000.

#### Objective evidence observed:

Per document review

Per document review



### Local law and/or ETI requirement

In accordance with PRC Labor Law article 72 The sources of social insurance funds shall be determined according to the categories of insurance, and the practice of unified accumulation of insurance funds shall be introduced. The employer and individual labourers shall participate in social insurance in accordance with law and pay social insurance costs.

Article 73 Labourers shall be entitled to social insurance treatment in any one of the following cases:

- (1) Pension insurance;
- (2) Medical insurance;
- (3) Occupational injury insurance;
- (4) Unemployment insurance;
- (5) Child-bearing insurance.

The dependents of the labourer who dies shall enjoy, in accordance with law, subsidies provided to these dependents.

The conditions and standards on the eligibility of labourers for social insurance treatment shall be stipulated by laws and regulations.

The social insurance funds for labourers shall be paid in due time and in full.

### Recommended corrective action:

It is recommended that the factory should ensure all eligible employees are entitled with all five types of social insurance schemes and therefore receive all of their statutory welfare to comply with the Law. Under situations, some employees might be reluctant to be enrolled and contribute to such social insurances schemes, the factory should host training sessions to help them understand the importance of contributing toward social insurance schemes.

### Observation:

#### Description of observation:

None

#### Local law or ETI requirement:

N/A

#### Comments:

N/A

Same as above

#### Objective evidence observed:

N/A

### Good Examples observed:

#### Description of Good Example (GE):

None

Same as above

#### Objective Evidence Observed:

N/A

## 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: 8 hours per day and 40 hours per week Same as above	8 hours per day and 40 hours per week Same as above	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
B: Overtime hours: (Maximum legal and actual overtime hours, please state if possible per day, week, and month)	Legal maximum: 3 hours per day and 36 hours per month Same as above	2 hours per day and 106 hours per month 0 hour per day and 36 hours per month	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
C: Wage for standard/contracted hours: (Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)	Legal minimum: RMB 1700 per month / RMB 9.77 per hour since July 1, 2017 Same as above	RMB 9.78 per hour Same as above	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
D: Overtime wage: (Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)	150%, 200% and 300% of employee normal rate for overtime on normal workdays, rest days and official public holidays respectively Same as above	150%, 200% and 300% of employee normal rate for overtime on normal workdays, rest days and official public holidays respectively Same as above	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Wages analysis: (Click here to return to Key Information)	
A: Were accurate records shown at the first request?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Same as above
A1: If No, why not?	N/A Same as above
B: Sample Size Checked	26 samples from May 2019 (most current month) 26 samples from April 2019 (2nd most current month)



(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 December 2018 (random month) 10 samples from August 2019 (most current) 10 samples from July 2019 (second most current month) 10 samples from June 2019 (random month)		
C: Are there different legal minimum wage grades? If <b>Yes</b> , please specify all.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No	If <b>Yes</b> , please give details:	
D: If there are different legal minimum grades, are all workers graded and paid correctly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> N/A	If <b>No</b> , 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?	<input type="checkbox"/> Below legal min <input type="checkbox"/> Meet <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Above	Lowest actual wages found: <i>Note: full time employees and please state hour / week / month etc.</i>  RMB 3947 = RMB 1641.38 (normal wages) + RMB 1547.69 (overtime hours) + RMB 579.31 (job allowance) + RMB 50 (living bonus) + RMB 50 (full attendance bonus) + RMB 78.24 (rest public holiday bonus)  RMB 3131 = RMB 1719.54 (normal wages) + RMB 704.16 (overtime hours) + RMB 606.9 (job allowance) + RMB 50 (living bonus) + RMB 50 (full attendance bonus)	
F: Please indicate the breakdown of workforce per earnings:	F1: ___% of workforce earning under minimum wage F2: ___% of workforce earning minimum wage F3: ___100___% of workforce earning above minimum wage Same as above		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: <i>Note: full time employees and please state hour / week / month etc.</i> Job allowance (RMB 800-1300 / month) Living bonus (RMB 50 / month) Full attendance bonus (RMB 50 / month)  Same as above		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, tax Same as above		
I: Have these deductions been made?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No	I1: Please list all deductions that <b>have</b> been made.	1. 2.  Please describe:
		I2: Please list all deductions that	1. social insurance 2.



		have not been made.	Please describe:
J: Were appropriate records available to verify hours of work and wages?	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
K: Were any inconsistencies found? (if yes describe nature)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No	K1: Type <input type="checkbox"/> Poor record keeping <input type="checkbox"/> Isolated incident <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: Nil		
M: Is there a defined living wage: <i>This is <u>not</u> normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No M1: Please specify amount/time: N/A		
M2: If yes, what was the calculation method used.	<input type="checkbox"/> ISEAL/Anker Benchmarks <input type="checkbox"/> Asia Floor Wage <input type="checkbox"/> Figures provided by Unions <input type="checkbox"/> Living Wage Foundation UK <input type="checkbox"/> Fair Wear Wage Ladder <input type="checkbox"/> Fairtrade Foundation Other – please give details: N/A <b>Same as above</b>		
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please give details: Nil <b>Same as above</b>		
O: Are workers paid in a timely manner in line with local law?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <b>Same as above</b>		
P: Is there evidence that equal rates are being paid for equal work:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Please give details: Through factory rules review, payroll records review and employees' interview, it was confirmed that equal rates are being paid for equal work. <b>Same as above</b>		
Q: How are workers paid:	<input type="checkbox"/> Cash <input type="checkbox"/> Cheque <input checked="" type="checkbox"/> Bank Transfer		



	<input type="checkbox"/> Other Q1: If other, please explain: Same as above
--	--

## 6: Working Hours are not Excessive

[\(Click here to return to summary of findings\)](#)

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

### 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:

Written working hours policy (involved relevant local law regarding normal, OT hours and OT wage rate etc.) in place stated in the social compliance management manual which had clearly been communicated to all workers via labour contracts, factory rules (covered voluntary overtime policy, special terms for young workers / pregnant women / nursing mothers etc.) posting and training etc. The factory had a system for monitoring and managing working hours.

During this assessment, the factory provided 14 months attendance records (June 2018 to July 2019) for assessor's review. Based on provided time attendance records, workers' working hours was 8-10 hours a day /58-66 hours a week, with the average being 62 hours per week. The most continuous working days without rest were 13 days, while the average continuous working days without rest were 10 days. No OT extension waiver approval was obtained by the factory.



During this assessment, the factory provided 5 months attendance records (June 2019 to October 2019) for assessor's review. Based on provided time attendance records, workers' working hours was 8 hours a day / 44-48 hours a week, with the average being 48 hours per week. The most continuous working days without rest were 6 days, while the average continuous working days without rest were 6 days. No OT extension waiver approval was obtained by the factory.

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

Details:

- Employee handbook
- Wages and benefits policy
- Annual leave records
- Resigned workers time records
- Past 12 months payroll and 14 months' time records
- Production records
- Leave records
- Past 3 months payroll and 5 months' time records
- Production records

Any other comments:

Nil

Nil

### Non-compliance:

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

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

It was noted that the monthly overtime hours of 26 out of 26 randomly selected workers exceeded 36 hours in May 2019 with the highest of 92 hours; 26 out of 26 exceeded 36 hours in April 2019 with the highest of 90 hours; 26 out of 26 exceeded 36 hours in December 2018 with the highest of 106 hours. (remark: the maximum weekday overtime hours in recent 2 months is 2 hours (total 10 hours on that day)).

**Current status:** Corrected.

It was noted that the monthly overtime working hours of 10 out of 10 randomly selected workers were within 36 hours in June 2019, July 2019 and August 2019 respectively.

#### Local law and/or ETI requirement:

In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

#### 1. Objective evidence observed:

Per document review

Per document review



**Recommended corrective action:** It is recommended that the factory should arrange reasonable production plan, increase productivity using positive means (such as bonuses) and reduce the overtime hours to ensure it is within 3 hours per day and 36 hours per month. Employees should be educated on health/safety dangers of excessive overtime.

## 2. Description of non-compliance:

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

It was noted that 26 out of 26 randomly selected workers have worked more than 6 consecutive days without 1 day off from June 2018 to July 2019, the maximum consecutive working days were 13 days from May 13-25, 2019. (remark: the maximum consecutive working days in recent 2 months is 13 days from May 13-25, 2019).

**Current status:** Corrected.

It was noted that 10 out of 10 randomly selected workers were guaranteed 1 day of rest per 7 days from June 2019 to October 2019.

**Local law and/or ETI requirement:** In accordance with PRC Labor Law article 38, the employer shall guarantee that its staff and workers have at least one day off in a week.

**Recommended corrective action:** It is recommended that the factory should arrange reasonable production plan, increase productivity using positive means (such as bonuses) and ensure every worker enjoy at least 1 day off in a week. Develop a work schedule that limits overtime and does not encourage employees to work on their rest days. Employees should be educated on the health/safety impact of excessive overtime.

## 3. Description of non-compliance:

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

It was noted that the weekly working hours of 26 out of 26 randomly selected workers exceeded 66 hours in May 2019 with the highest of 80 hours; 26 out of 26 workers exceeded 66 hours in April 2019 with the highest of 66 hours; 26 out of 26 exceeded 60 hours in December 2018 with the highest of 66 hours.

**Current status:** Corrected.

It was noted that the weekly working hours 10 out of 10 randomly selected workers were within 60 hours in June 2019, July 2019 and August 2019 respectively.

## Local law and/or ETI requirement:

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

**Recommended corrective action:** It is recommended that factory should arrange reasonable production plan, increase productivity using positive means (such as bonuses) and limit the working hours to comply with the client's requirement.

## 2. Objective evidence observed:

Per document review

Per document review

## 3. Objective evidence observed:

Per document review

Per document review

Observation:



<b>Description of observation:</b> None  <b>Local law or ETI requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A
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Good Examples observed:	
<b>Description of Good Example (GE):</b> None  Same as above	<b>Objective Evidence Observed:</b>  N/A

Working hours' analysis					
Please include time e.g. hour/week/month <a href="#">(Go back to Key information)</a>					
Systems & Processes					
A. What timekeeping systems are used: time card etc.	Describe: finger printer system  Same as above				
B: Is sample size same as in wages section?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If N, please give details Additional 26 samples were selected from June 2019 (current non-paid month) to verify the overtime hours.				
C: Are standard/contracted working hours defined in all contracts/employment agreements?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  Same as above	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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  Same as above	If YES, please complete as appropriate:			
		<input type="checkbox"/> 0 hrs	<input type="checkbox"/> Part time	<input type="checkbox"/> Variable hrs	<input type="checkbox"/> Other
		If "Other", Please define:			
E. Do any standard/contracted working hours defined in	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, please detail hours, %, types of workers affected and frequency			

contracts/employment agreements exceed 48 hours per week?	Same as above	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: <input type="checkbox"/> 1 in 7 days <input checked="" type="checkbox"/> 2 in 14 days <input checked="" type="checkbox"/> No If 'No', please explain: The maximum consecutive days was 13 days	Is this allowed by local law? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Maximum number of days worked without a day off (in sample):		
13 6		
<b>Standard/Contracted Hours worked</b>		
G: Were standard working hours over 48 hours per week found?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, % of workers & frequency:  NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If yes, please give details:  
<b>Overtime Hours worked</b>		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day, 26 hours per week, 106 hours per month. 0 hours per day, 8 hours per week, 36 hours per month.	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Workers worked maximum 66 hours a week in sampled months. Workers worked maximum 48 hours a week in sampled months.	
K: Approximate percentage of total workers on highest overtime hours:	100 % 100 %	



L: Is overtime voluntary?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Conflicting Information <b>Same as above</b>	Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements: Per employee interview, document review
<b>Overtime Premiums</b>		
M: Are the correct legal overtime premiums paid?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – there is no legal requirement to OT premium	Please give details of normal day overtime premium as a % of <b>standard</b> wages:  150% of employee normal rate for overtime on normal workdays. <b>150%, 200% and 300% of employee normal rate for overtime on normal workdays, rest days and official public holidays respectively for 100% employees.</b>
N: Is overtime paid at a premium?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If yes, please describe % of workers & frequency:  100% workers and paid monthly at 150%, 200% and 300% of employee normal rate for overtime on normal workdays, rest days and official public holidays respectively. <b>150%, 200% and 300% of employee normal rate for overtime on normal workdays, rest days and official public holidays respectively for 100% employees and paid monthly.</b>
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.	<input type="checkbox"/> No <input type="checkbox"/> Consolidated pay (May be standard wages above minimum legal wage, with no/low overtime premium) <input type="checkbox"/> Collective Bargaining agreements <input type="checkbox"/> Other  <b>Same as above</b>	
	Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	NA  <b>Same as above</b>	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please	<input checked="" type="checkbox"/> <b>Overtime is voluntary</b> <input type="checkbox"/> Onsite Collective bargaining allows 60+ hours/week <input type="checkbox"/> Safeguards are in place to protect worker's health and safety <input type="checkbox"/> Site can demonstrate exceptional circumstances <input type="checkbox"/> Other reasons (please specify) <b>Same as above</b>	

complete the boxes where relevant.	Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:  NA Same as above
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, please give details: Same as above
R: If sufficient workers cannot be hired, are new working time arrangements explored to ensure that overtime is the exception rather than the rule.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Same as above



## 7: No Discrimination is Practiced

[\(Click here to return to summary of findings\)](#)

### 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:

The factory has written policy on anti-discrimination as well as policy on compensation, promotion and training etc.

New staff hiring policy and advertise indicates that no pregnancy or health check (HIV testing, HB check) was required.

Gender and ethnic balance between workers and middle management is proper. There's grievance channel (suggestion box or anonymous phone line etc.) for workers to report any discrimination.

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

##### Details:

- Factory policy, hiring procedure
- Employee handbook,
- Payrolls, training records
- Contracts, termination records

##### Any other comments:

Nil

Same as above

A: Gender breakdown of Management + Supervisors (Include as one combined group)	A1: Male: <u>45</u> % A2: Female <u>55</u> % Male: <u>60</u> % Female <u>40</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:	50% female workers were skilled workers Same as above
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?:	<input type="checkbox"/> Hiring <input type="checkbox"/> Compensation <input type="checkbox"/> Access to training <input type="checkbox"/> Promotion <input type="checkbox"/> Termination or retirement <input type="checkbox"/> No evidence of discrimination found

	<p>Same as above</p> <p>C1: Please give details: Nil</p>
--	--

Professional Development	
A: What type of training and development are available for workers?	<p>Nil</p> <p>Same as above</p>

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>If no, please give details:</p> <p>Same as above</p>
--	---

Non-compliance:	
<p><b>1. Description of non-compliance:</b></p> <p><input type="checkbox"/> NC against ETI      <input type="checkbox"/> NC against Local Law      <input type="checkbox"/> NC against customer code:</p> <p>None observed</p> <p><b>Local law and/or ETI requirement:</b></p> <p>N/A</p> <p><b>Recommended corrective action:</b></p> <p>N/A</p> <p>Same as above</p>	<p><b>Objective evidence observed:</b></p> <p>N/A</p>

Observation:	
<p><b>Description of observation:</b></p> <p>None</p> <p><b>Local law or ETI requirement:</b></p> <p>N/A</p> <p><b>Comments:</b></p> <p>N/A</p>	<p><b>Objective evidence observed:</b></p> <p>N/A</p>



Same as above

**Good Examples observed:**

Description of Good Example (GE):  
None

**Objective Evidence  
Observed:**  
N/A

Same as above

## 8: Regular Employment Is Provided

[\(Click here to return to summary of findings\)](#)

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### 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:

Work performed was on the basis of recognized employment relationship established through national law and normal practice. The factory never used any home-workers or agency workers. No apprentice or temporary worker was working in the factory. The factory signs labour contracts with employees within 30 days since employment, and all workers can have their own a copy of the contract and pay slip. HR staff was aware of local law concerning above worker pattern.

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

#### Details:

- Factory policy, employee handbook
- Labour contracts
- Hiring and termination records
- Personal files
- Management and workers interview

#### Any other comments:

Nil

Same as above



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI <input type="checkbox"/> NC against Local Law <input type="checkbox"/> NC against customer code: None  <b>Local law and/or ETI requirement:</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>1. Objective evidence observed:</b> N/A

Observation:	
<b>Description of observation:</b> None  <b>Local law or ETI requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A

Good Examples observed:	
<b>Description of Good Example (GE):</b> N/A  Same as above	<b>Objective Evidence Observed:</b> N/A

## 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?	<input checked="" type="checkbox"/> Terms & Conditions presented <input checked="" type="checkbox"/> Understood by workers <input checked="" type="checkbox"/> Same as actual conditions  A1: If any are unchecked, please describe finding and specific category(ies) of workers affected: Nil Same as above

<p>B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?</p>	<p><input type="checkbox"/> Yes  <input checked="" type="checkbox"/> No  B1: If yes, please describe details and specific category(ies) of workers affected: Nil  Same as above</p>
<p>C: If yes, check all that apply:</p>	<p> <input type="checkbox"/> Recruitment / hiring fees  <input type="checkbox"/> Service fees  <input type="checkbox"/> Application costs  <input type="checkbox"/> Recommendation fees  <input type="checkbox"/> Placement fees  <input type="checkbox"/> Administrative, overhead or processing fees  <input type="checkbox"/> Skills tests  <input type="checkbox"/> Certifications  <input type="checkbox"/> Medical screenings  <input type="checkbox"/> Passports/ID's  <input type="checkbox"/> Work / resident permits  <input type="checkbox"/> Birth certificates  <input type="checkbox"/> Police clearance fees  <input type="checkbox"/> Any transportation and lodging costs after employment offer  <input type="checkbox"/> Any transport costs between work place and home  <input type="checkbox"/> Any relocation costs after commencement of employment  <input type="checkbox"/> New hire training / orientation fees  <input type="checkbox"/> Medical exam fees  <input type="checkbox"/> Deposit bonds or other deposits  <input type="checkbox"/> Any other non-monetary assets  <input type="checkbox"/> Other –  C1: If other, please give details: N/A  Same as above </p>
<p>D: If any checked, give details:</p>	<p>Nil  Same as above</p>

<p align="center"><b>Migrant Workers:</b></p> <p><i>The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity</i></p>		
<p>A: Type of work undertaken by migrant workers:</p>	<p>All production processes were undertaken by migrant workers.  Same as above</p>	
<p>B: Please give details about recruitment agencies for migrant workers:</p>	<p>Total number of (in country recruitment agencies) used: 0  Total number of (outside of local country) recruitment agencies used: 0  Same as above</p>	
<p>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?</p>	<p> <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No  Please describe finding: Nil  Same as above </p>	<p>Observations  N/A</p>



<p>D: Are Any migrant workers in skilled, technical, or management roles</p> <p><i>Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If Yes number and example of roles All working roles were based on workers' working ability, instead of on their migrant provinces. <b>Same as above</b></p>
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## NON-EMPLOYEE WORKERS

Recruitment Fees:	
<p>A: Are there any fees?</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No N/A <b>Same as above</b></p>
<p>B: If yes, check all that apply:</p>	<p> <input type="checkbox"/> Recruitment / hiring fees  <input type="checkbox"/> Service fees  <input type="checkbox"/> Application costs  <input type="checkbox"/> Recommendation fees  <input type="checkbox"/> Placement fees  <input type="checkbox"/> Administrative, overhead or processing fees  <input type="checkbox"/> Skills tests  <input type="checkbox"/> Certifications  <input type="checkbox"/> Medical screenings  <input type="checkbox"/> Passports/ID's  <input type="checkbox"/> Work / resident permits  <input type="checkbox"/> Birth certificates  <input type="checkbox"/> Police clearance fees  <input type="checkbox"/> Any transportation and lodging costs after employment offer  <input type="checkbox"/> Any transport costs between work place and home  <input type="checkbox"/> Any relocation costs after commencement of employment  <input type="checkbox"/> New hire training / orientation fees  <input type="checkbox"/> Medical exam fees  <input type="checkbox"/> Deposit bonds or other deposits  <input type="checkbox"/> Any other non-monetary assets  <input type="checkbox"/> Other         </p> <p>B1 – If other, please give details: N/A <b>Same as above</b></p>
<p>C: If any checked, give details:</p>	<p>N/A <b>Same as above</b></p>

Agency Workers (if applicable)	
<p><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></p>	
<p>A: Number of agencies used (average):</p>	<p>A1: Names if available: N/A no agency worker was used in the factory <b>Same as above</b></p>

B: Were agency workers' age / pay / hours included within the scope of this audit?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A <b>Same as above</b>
C: Were sufficient documents for agency workers available for review?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A <b>Same as above</b>
D: Is there a legal contract / agreement with all agencies?	<input type="checkbox"/> Yes <input type="checkbox"/> No Details: N/A <b>Same as above</b>
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No Please describe: N/A <b>Same as above</b>

<p align="center"><b>Contractors:</b></p> <p><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></p>	
A: Any contractors on site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No A1: If yes, how many contractors are present, please give details: N/A <b>Same as above</b>
B: If <b>Yes</b> , how many workers supplied by contractors?	N/A <b>Same as above</b>
C: Do all contractor workers understand their terms of employment?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No C1: Please describe finding: N/A <b>Same as above</b>
D: If <b>Yes</b> , please give evidence for contractor workers being paid per law:	N/A <b>Same as above</b>



### 8A: Sub-Contracting and Homeworking

[\(Click here to return to summary of findings\)](#)

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

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:

The factory has customer policy on sub-contracting, homeworking and external processing, as well as written policy and procedure in place to control external working.

The factory posted customers' Code of Conduct in the facility. Through site tour, documents review and management & workers interview, no subcontractor was used by the factory.

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

Details:

Factory policy, quality records and management & workers interview

Site tour (check production process)

Same as above

### Non-compliance:

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed

#### Local law and/or ETI /Additional Elements requirement:

N/A

#### Recommended corrective action:

N/A

Same as above

#### Objective evidence observed:

N/A

Observation:	
<b>Description of observation:</b> None observed  <b>Local law or ETI/Additional elements requirement:</b> NA  <b>Comments:</b> NA  Same as above	<b>Objective evidence observed:</b> NA

Good Examples observed:	
<b>Description of Good Example (GE):</b> None  Same as above	<b>Objective Evidence Observed:</b> N/A

Summary of sub-contracting – if applicable	
<input checked="" type="checkbox"/> Not Applicable please x <input checked="" type="checkbox"/> Not Applicable please x	
<b>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</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please describe: Per management interview and document review, no subcontractor was used by the factory.  Same as above
<b>B: If sub-contractors are used, is there evidence this has been agreed with the main client?</b>	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: If <b>Yes</b> , summarise details: N/A Same as above
<b>C: Number of sub-contractors/agents used:</b>	0 Same as above
<b>D: Is there a site policy on sub-contracting?</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No D1: If <b>Yes</b> , summarise details: Policy was established for subcontractor in case of needed in the factory. Same as above
<b>E: What checks are in place to ensure no child labour is being used and work is safe?</b>	N/A Same as above



Summary of homeworking – if applicable			
<input checked="" type="checkbox"/> Not Applicable please x <input checked="" type="checkbox"/> Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	<input type="checkbox"/> Yes <input type="checkbox"/> No A1: If <b>Yes</b> , summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	<input type="checkbox"/> Directly <input type="checkbox"/> Through Agents		C1: If through agents, number of agents:
D: Is there a site policy on homeworking?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?	N/A		
F: What processes are carried out by homeworkers?	N/A		
G: Do any contracts exist for homeworkers?	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details:		
H: Are full records of homeworkers available at the site?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

**9: No Harsh or Inhumane Treatment is Allowed**  
[\(Click here to return to summary of findings\)](#)

**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 <sup>rd</sup> party?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No A1: Please give details: worker committee was established in the factory for suggestion collecting. <b>Same as above</b>
B: If <b>Yes</b> , are workers aware of these channels and have access? Please give details.	Yes, per employees' interview <b>Same as above</b>
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Worker committee <b>Same as above</b>
D: Which of the following groups is there a grievance mechanism in place for?	<input type="checkbox"/> Workers <input type="checkbox"/> Communities <input type="checkbox"/> Suppliers <input type="checkbox"/> Other D1: Please give Details: N/A <b>Same as above</b>
E: Are there any open disputes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No E1: If yes, please give details <b>Same as above</b>
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No F1: If no, please give details <b>Same as above</b>
G: Is there a published and transparent disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No G1: If no, please explain <b>Same as above</b>



H: If yes, are workers aware of these the disciplinary procedure?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No H1: If no, please give details <b>Same as above</b>
I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	<input type="checkbox"/> Yes <input type="checkbox"/> No I1: If yes, please give details NA. No monetary fine policy in the factory. <b>Same as above</b>

### Current Systems and Evidence Examined

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

#### Current systems:

The factory has established an anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited in this facility.

The disciplinary procedure only includes oral warning, written warning and education.

The factory has established grievance mechanism with non-retaliation policy and allow workers to report issues anonymously. Related training records and grievance records / documented evidence were maintained in place.

Security practices were humane and comply with customers' expectation.

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

##### Details:

- Policy of prevention of harassment and abuse.
- Internal grievance procedure documentation.
- Training records
- Employee interview

##### Any other comments:

Nil

**Same as above**

### Non-compliance:

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

☐ NC against ETI ☐ NC against Local Law ☐ NC against customer

code:

None

#### Local law and/or ETI requirement:

N/A

#### Recommended corrective action:

N/A

#### Objective evidence

observed:

N/A

Same as above

#### Observation:

**Description of observation:**

None

**Local law or ETI requirement:**

N/A

**Comments:**

N/A

Same as above

**Objective evidence**

**observed:**

N/A

#### Good Examples observed:

**Description of Good Example (GE):**

None

Same as above

**Objective Evidence**

**Observed:**

N/A



## 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:

The factory did not have any policy on foreign migrant worker or agency worker in place, and did not use agency worker. All workers were directly hired by the factory.

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

Details:

- Hiring procedure
- Personnel files
- Employee handbook
- Employee interview

Any other comments:

Nil

Same as above

### Non-compliance:

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

☐ NC against ETI/Additional Elements

☐ NC against Local Law

☐ NC against customer code:

None observed

**Local law and/or ETI /Additional Elements requirement:**

N/A

**Recommended corrective action:**

N/A

Same as above

**Objective evidence observed:**

N/A

### Observation:

<b>Description of observation:</b> None  <b>Local law or ETI/Additional Elements requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A
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Good examples observed:	
<b>Description of Good Example (GE):</b> None  Same as above	<b>Objective Evidence Observed:</b> N/A



### 10. Other issue areas 10B2: Environment 2-Pillar

[\(Click here to return to summary of findings\)](#)

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

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

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

### Current Systems and Evidence Examined

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

#### Current systems:

The site has written policy in place concerning environment issue (including dusts collecting and treatment), and the responsible management staff was aware of local laws / regulations governing environment, keeps the law up to date.

The factory has got the environmental impact assessment documents examined and approved by authorized environmental protection department.

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

Details:

- Environmental impact report
- Environmental project completion acceptance report
- Factory management interview
- Factory tour

Any other comments:

Nil

Same as above

**Non-compliance:**

<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements None observed  <input checked="" type="checkbox"/> NC against Local Law  <b>Local law and/or ETI/Additional Elements requirement:</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A
--	--

Observation:	
<b>Description of observation:</b> None  <b>Local law or ETI/additional elements requirement:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A

Good examples observed:	
<b>Description of Good Example (GE):</b> None  Same as above	<b>Objective Evidence Observed:</b> N/A



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

[\(Click here to return to summary of findings\)](#)

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:

NA

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

Details:

Any other comments:

Same as above

Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code: N/A  <b>Local law and/or ETI/Additional Elements requirement:</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A

Observation:	
<b>Description of observation:</b> N/A  <b>Local law or ETI/Additional elements requirements:</b> N/A  <b>Comments:</b> N/A  Same as above	<b>Objective evidence observed:</b> N/A

Good examples observed:	
<b>Description of Good Example (GE):</b> N/A  Same as above	<b>Objective Evidence Observed:</b> N/A



<b>Environmental Analysis</b> <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):	N/A Same as above
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: N/A Same as above
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No C1: Please give details: N/A Same as above
D: Does the site have an Environmental policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No D1: If yes, is it publicly available? N/A Same as above
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	<input type="checkbox"/> Yes <input type="checkbox"/> No E1: Please give details: N/A Same as above
F: Does the site have a Biodiversity policy? <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No Same as above
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please give details. <i>(For guidance, please see Measurement criteria)</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No G1: Please give details: N/A Same as above
H: Have all legally required permits been shown? Please give details.	<input type="checkbox"/> Yes <input type="checkbox"/> No H1: Please give details: N/A Same as above
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A I1: Please give details: N/A Same as above
J: Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No J1: Please give details: N/A Same as above
K: Facility has reduction targets in place for environmental aspects e.g. water consumption	<input type="checkbox"/> Yes <input type="checkbox"/> No K1: Please give details: N/A Same as above



and discharge, waste, energy and green-house gas emissions:		
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	<input type="checkbox"/> Yes <input type="checkbox"/> No L1: Please give details: N/A Same as above	
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No M1: Please give details: N/A Same as above	
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?	<input type="checkbox"/> Yes <input type="checkbox"/> No N1: Please give details: N/A Same as above	
<b>Usage/Discharge analysis</b>		
Criteria	Previous year: Please state period: _____ N/A _____ N/A	Current Year: Please state period: _ N/A N/A
Electricity Usage: Kw/hrs	N/A N/A	N/A N/A
Renewable Energy Usage: Kw/hrs	N/A N/A	N/A N/A
Gas Usage: Kw/hrs	N/A N/A	N/A N/A
Has site completed any carbon Footprint Analysis?	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A N/A	<input type="checkbox"/> Yes <input type="checkbox"/> No N/A N/A
If <b>Yes</b> , please state result	N/A N/A	N/A N/A
Water Sources: Please list all sources e.g. lake, river, and local water authority.	• N/A N/A	• N/A N/A
Water Volume Used: (m³)	N/A N/A	N/A N/A
Water Discharged: Please list all receiving waters/recipients.	• N/A N/A	• N/A N/A
Water Volume Discharged: (m³)	N/A N/A	N/A N/A



Water Volume Recycled: (m <sup>3</sup> )	N/A N/A	N/A N/A
Total waste Produced (please state units)	N/A N/A	N/A N/A
Total hazardous waste Produced: (please state units)	N/A N/A	N/A N/A
Waste to Recycling: (please state units)	N/A N/A	N/A N/A
Waste to Landfill: (please state units)	N/A N/A	N/A N/A
Waste to other: (please give details and state units)	N/A N/A	N/A N/A
Total Product Produced (please state units)	N/A N/A	N/A N/A

### 10C: Business Ethics – 4-Pillar Audit

[\(Click here to return to summary of findings\)](#)  
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:

N/A

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

Details:

Any other comments:

Same as above



Non-compliance:	
<b>1. Description of non-compliance:</b> <input type="checkbox"/> NC against ETI/Additional Elements <input type="checkbox"/> NC against Local <input type="checkbox"/> NC against customer code: N/A  <b>Local law and/or ETI/Additional Elements requirement:</b> N/A  <b>Recommended corrective action:</b> N/A  Same as above	<b>Objective evidence observed:</b> <i>(where relevant please add photo numbers)</i> N/A

Observation	
<b>Description of observation:</b> N/A  <b>Local law or ETI/Additional elements requirement:</b>  <b>Comments:</b> Same as above	<b>Objective evidence observed:</b> N/A

Good examples observed:	
<b>Description of Good Example (GE):</b> N/A  Same as above	<b>Objective Evidence Observed:</b> N/A

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	<input type="checkbox"/> Internal Policy <input type="checkbox"/> Policy for third parties including suppliers A1: Please give details: N/A  Same as above
B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No B1: Please give details: N/A

	Same as above
C: Is the policy updated on a regular (as needed) basis?	<input type="checkbox"/> Yes <input type="checkbox"/> No  C1: Please give details: N/A  Same as above
D: Does the site require third parties including suppliers to complete their own business ethics training	<input type="checkbox"/> Yes <input type="checkbox"/> No  D1: Please give details: N/A  Same as above



Other findings

Other Findings Outside the Scope of the Code
<p>Nil</p> <p>Same as above</p>

Community Benefits
<p><i>(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)</i></p> <p>Nil</p> <p>Same as above</p>

## Appendix 1

<p><b>Comparison between ETI code and Customer's Supplier's Code.</b> 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."</p> <p> <input type="checkbox"/> Not Applicable please x  <input checked="" type="checkbox"/> Not Applicable please x         </p>	
<p><b>NOTE:</b> 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.</p>	<p><b>Instruction to Audit Company:</b> fill in the relevant clauses from the Customer Supplier Code - where applicable.</p>
<b>ETI Code / Additional Elements</b>	<b>Customer's Supplier Code equivalent</b>
<b>0.A. Universal Rights covering UNGP</b>	<b>0.A. Universal Rights covering UNGP</b>
<p><b>0.A. Guidance for Observations</b></p> <p>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.</p> <p>0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights</p> <p>0.A.3 Businesses shall identify their stakeholders and salient issues.</p> <p>0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.</p> <p>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.</p> <p>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.</p>	
<b>0.B. Management Systems &amp; Code Implementation</b>	<b>0.B. Management Systems &amp; Code Implementation</b>
<p>0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.</p>	



<p>0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.</p> <p>0.3 Suppliers are expected to communicate this Code to all employees.</p> <p>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.</p>	
<b>ETI 1. Forced Labour</b>	<b>ETI 1. Forced Labour</b>
<p>1.1 There is no forced, bonded or involuntary prison labour.</p> <p>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.</p>	
<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>	<b>ETI 2. Freedom of association and the right to collective bargaining are respected</b>
<p>2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.</p> <p>2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.</p> <p>2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.</p> <p>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.</p>	
<b>ETI 3. Working conditions are safe and hygienic</b>	<b>ETI 3. Working conditions are safe and hygienic</b>
<p>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.</p> <p>3.2 Workers shall receive regular and recorded Health &amp; Safety training, and such training shall be repeated for new or reassigned workers.</p> <p>3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.</p>	<p>1. In accordance with client requirement, Multi-tenancy (more than one tenant in an area) are not permitted unless there is strong grounds why an exception could be made, in which case it must be submitted to the Director for Ethical Trade for review. Mixed use buildings (residential and commercial) are not permitted.</p> <p>2. In accordance with client requirement, Fire detectors are working and located so that they provide early warning of fire.</p> <p>3. In accordance with client requirement, in buildings over two stories - there is a means of</p>



<p>3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.</p> <p>3.5 The company observing the code shall assign responsibility for Health &amp; Safety to a senior management representative.</p>	<p>communicating between floors (PA system or walkie-talkies - no mobile phones).</p> <p>4. In accordance with client requirement, in buildings over two stories, fire detectors are mains powered and linked to zoned control panel. The audible alarm is mains powered and link to the fire detectors.</p>
<b>ETI 4. Child labour shall not be used</b>	<b>ETI 4. Child labour shall not be used</b>
<p>4.1 There shall be no new recruitment of child labour.</p> <p>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.</p> <p>4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.</p> <p>4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.</p>	
<b>ETI 5. Living wages are paid</b>	<b>ETI 5. Living wages are paid</b>
<p>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.</p> <p>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.</p> <p>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.</p>	
<b>ETI 6. Working Hours are not excessive</b>	<b>ETI 6. Working Hours are not excessive</b>
<p>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.</p>	



<p>6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.</p> <p>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.</p> <p>6.4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.</p> <p>6.5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where <b>all</b> of the following are met:</p> <ul style="list-style-type: none"> <li>– this is allowed by national law;</li> <li>– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;</li> <li>– appropriate safeguards are taken to protect the workers' health and safety; and</li> <li>– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.</li> </ul> <p>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.</p>	
<b>ETI 7. No discrimination is practised</b>	<b>ETI 7. No discrimination is practised</b>
<p>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.</p>	
<b>ETI 8. Regular employment is provided</b>	<b>ETI 8. Regular employment is provided</b>
<p>8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.</p> <p>8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be</p>	



<p>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.</p> <p><b>Additional Elements: Responsible Recruitment</b></p> <p>8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.</p> <p>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.</p> <p>8.5 Employment agencies must only supply workers registered with them.</p> <p>8.6 Workers pay no recruitment fee at any stage of the recruitment process.</p> <p>8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.</p>	
<b>8A: Sub-Contracting and Homeworking</b>	<b>8A: Sub-Contracting and Homeworking</b>
<p>8A.1 There should be no sub-contracting unless previously agreed with the main client.</p> <p>8A.2 Systems and processes should be in place to manage sub-contracting, homeworking and external processing.</p>	
<b>ETI 9. No harsh or inhumane treatment is allowed</b>	<b>ETI 9. No harsh or inhumane treatment is allowed</b>
<p>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.</p> <p>Additional elements:</p> <p>9.2 companies should provide access to a confidential grievance mechanism for all workers</p>	
<b>10. Other Issue areas: 10A: Entitlement to Work and Immigration</b>	
<p><b>Additional Elements</b></p> <p>10A.1 Only workers with a legal right to work shall be employed or used by the supplier.</p> <p>10A.2 All workers, including employment agency staff, must be validated by the supplier for their</p>	



legal right to work by reviewing original documentation.	
<b>10. Other issue areas 10B2: Environment 2-Pillar</b>	
<p>10B2.1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.</p> <p>10B2.2 The supplier should be aware of and comply with their end clients' environmental requirements.</p> <p><i>Note for auditors and readers, this is not a full environmental assessment but a check on basic systems and management approach.</i></p>	

<b>SMETA Extra Sections for 4 Pillar Audit:</b>	<b>SMETA Extra Sections for 4 Pillar Audit:</b>
<b>Environment Section</b>	<b>Environment Section</b>
<p><b>B.4. Compliance Requirements</b></p> <p>10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.</p> <p>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.</p> <p>10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements</p> <p>10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.</p> <p>10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.</p> <p>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).</p> <p>10B4.7 Businesses shall make continuous improvements in their environmental performance.</p> <p>10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation</p> <p>10B4.9 Businesses should have a nominated individual responsible for co-ordinating the site's efforts to improve environmental performance.</p> <p><b>B4. Guidance for Observations</b></p>	

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



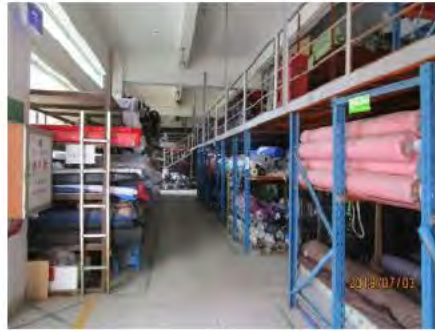
## Previous Photo Form

		
1. factory name	2. factory address	3. factory gate
		
4. production building	5. compounding section	6. preparation section (weaving)
		
7. preparation section (cutting)	8. sewing section	9. inspecting section





10. packing section



11. material warehouse



12. finished goods warehouse



13. evacuation plan



14. fire-proof facilities



15. visual fire alarm



16. smoke detector



17. attendance record system



18. suggestion box



19. first aid kit









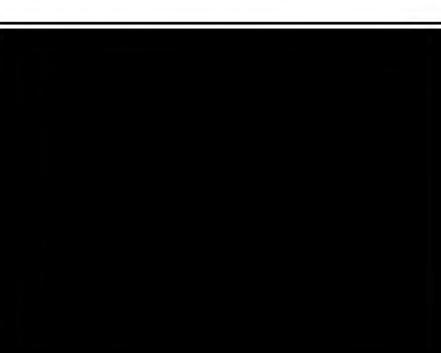



20. toilet



21. portable water


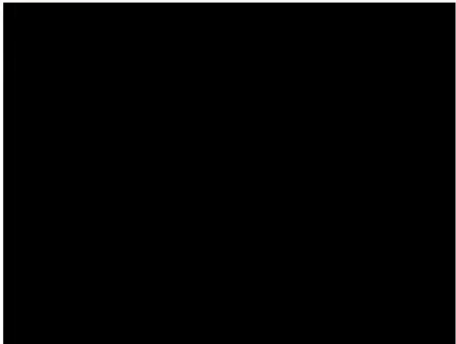









		
22. Tin shed (300 m2, used as cutting section and material storage)	23. NC-mix used building	24. NC-mixed used building
		
25. NC-multi-tenant site	26. NC-insufficient emergency light-1	27. NC-insufficient emergency light-2 (shed building)
		
28. NC-missing exit sign-1 (mezzanine)	29. NC-missing exit sign-2 (shed building)	30. NC-missing exit sign-3

		
<p>31. NC-missing exit sign-4 &amp; blocked safety exit &amp; rolling door in compounding section</p>	<p>32. NC-Expired external maintenance</p>	<p>33. NC-No smoke detector</p>



## Follow Up Photo Form

		
1. factory name	2. factory address	3. factory gate
		
4. production building	5. compounding section	6. weaving workshop
		
7. cutting workshop	8. sewing section	9. inspecting and packing sections



10. Raw material warehouse



11. Finished goods warehouse



12. Emergency exit, fire extinguishers, fire hydrant



13. evacuation plan



14. Drinking water



15. First aid kit



16. attendance recording machine and suggestion box



17. Fire alarm system

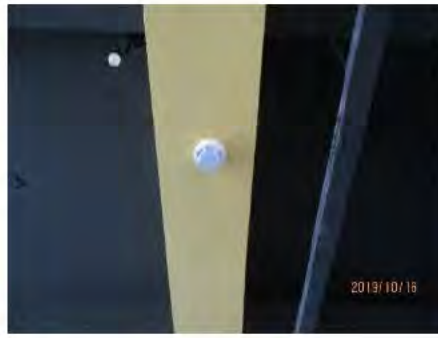


18. Smoke detector-1





19. Smoke detector-2



20. Smoke detector-3



21. Smoke detector-4



22. NC-mix used building



23. NC-mixed used building




24. NC-mixed used building


25. NC-mixed used building  
other floors  
were under decoration

26. NC-mixed used building  
(service building)

27. NC-No safety eye-shield was  
installed



		
28. Corrected: Exit sign was installed-1	29. Corrected: Exit sign was installed-2	30. Emergency light was installed
		
31. Corrected: Emergency light and exit sign was installed	32. Corrected: Emergency light and exit sign was installed, locking device was installed	33. Corrected: Fire extinguishers were maintained in May 2019
		N/A
34. Corrected: Evacuation floor plan was posted	35. Corrected: Locking device was installed to keep the door opening during working hours, exits were freely accessible	N/A





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

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

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