

Auditee :	<b>KONCAI Aluminum Cases Ltd.</b>
Audit Date From :	<b>11/12/2017</b>
Audit Date To :	<b>12/12/2017</b>
Expiry Date of the Audit :	<b>Please refer to the producer profile in the BSCI platform</b>
Auditing Company :	<b>TUEV Rheinland</b>
Auditor's Name(s) :	<b>Sam Wu(Lead)</b>
Auditing Branch (if applicable) :	<b>TUV Rheinland China</b>



## BSCI Audit Summary Report

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



Rating	A combination of ratings per performance area where:	Consequence
<div>A</div> <div>OUTSTANDING</div>	<div><div>o Minimum 7 performance area rated A</div><div>o No Performance area rated C, D or E</div></div> <div>These are three examples:</div> <div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div></div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div></div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div></div></div>	<div>The auditee has the level of maturity to maintain its improvement process without needing follow-up audit.</div>
<div>B</div> <div>GOOD</div>	<div><div>o Maximum 3 performance area rated C</div><div>o No performance area rated D or E</div></div> <div>These are three examples:</div> <div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div></div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>C</div></div><div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>B</div><div>C</div><div>C</div><div>C</div><div>C</div></div></div>	<div>The auditee has the level of maturity to maintain its improvement process without needing follow-up audit.</div>
<div>C</div> <div>ACCEPTABLE</div>	<div><div>o Maximum 2 performance areas rated D</div><div>o No performance area rated E</div></div> <div>These are three examples:</div> <div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div></div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>B</div><div>C</div><div>C</div><div>C</div><div>C</div><div>D</div></div><div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>C</div><div>D</div><div>D</div></div></div>	<div>The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.</div>
<div>D</div> <div>INSUFFICIENT</div>	<div><div>o Maximum 6 performance area rated E</div></div> <div>These are three examples:</div> <div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>D</div><div>D</div><div>D</div><div>D</div></div><div><div>A</div><div>A</div><div>A</div><div>B</div><div>B</div><div>B</div><div>C</div><div>C</div><div>C</div><div>C</div><div>D</div><div>D</div><div>D</div><div>D</div><div>E</div></div><div><div>D</div><div>D</div><div>D</div><div>D</div><div>D</div><div>D</div><div>D</div><div>D</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div></div></div>	<div>The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.</div>
<div>E</div> <div>UNACCEPTABLE</div>	<div><div>o Minimum 7 performance areas rated E</div></div> <div>These are three examples:</div> <div><div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>A</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div></div><div><div>A</div><div>A</div><div>B</div><div>B</div><div>C</div><div>D</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div></div><div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div><div>E</div></div></div>	<div>BSCI participants shall closely oversee the auditee's progress as it may represent a higher risk than other business partners</div>
<div>Zero Tolerance</div>	<div>A Zero Tolerance issue was identified (see Annex 5)</div>	<div>Immediate actions are required. The BSCI Zero Tolerance Protocol is to be followed.</div>

**Producer : KONCAI Aluminum Cases Ltd.**

DBID : 374734 and Audit Id : 113872

Audit Date : 11/12/2017

Audit Type : Full Audit

**Main Auditee Information**

Name of producer :	<b>KONCAI Aluminum Cases Ltd.</b>		
DBID number :	<b>374734</b>		
Audit ID :	<b>113872</b>		
Address :	<b>No.8, High-Technology Zone, PiKen Village Qingyuan</b>		
Province :	<b>Guangdong</b>	Country :	<b>China</b>
Management Representative :	<b>Shuguang Xiong</b>		
Contact person:	<b>Susy Li</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Textiles, clothing, leather</b>	Product group :	<b>other soft goods (please specify)</b>
Product Type :	<b>Cosmetic Cases &amp; Bags</b>		

**Audit Details**


Audit Range :	<input checked="" type="checkbox"/> Full Audit	Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	Agricultural	
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	Fully-Unannounced	Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by :	12/12/2018

**Rating per Performance Area (PA)**

PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	B	A	A	C	D	A	A	A	A	A	B	A

**Executive summary of audit report**

Based on business license, the auditee was established on 3 June 2013. It was located at No.8, High-Technology Zone, PiKen Village, QingYuan City, Guangdong Province, China(中国广东省清远市陂坑村高新区8号). It was noted that there were total 96 employees during this audit. The auditee mainly manufactured Cosmetic Cases & Bags. During the factory tour, it was noted that the main production processes were Cutting, Sewing, Assembly and Packing. No subcontracted process or service was used by the auditee. No child labor or young worker was identified. The factory management was cooperative with this audit and gave full access to auditor for factory tour, document review and worker interview. And the factory management promised to correct all finding immediately. No obvious peak or low seasons in the auditee.

**Remark:**

- 1) There were two factories in the same boundary including the auditee and Qingyuan Diaobao Hairdressing Products Co., Ltd.(清远雕堡美妆用品有限公司) specialized on beauty equipment manufacturing. But all the buildings in the same boundary were owned by Qingyuan Diaobao Electric Appliances Co., Ltd.(清远雕堡电器有限公司). The owner did not have any production in the boundary. The auditee rented 3F-5F of one 5-storey building as production, one flat as warehouse and one 6-storey building as dormitory(Kitchen and canteen was located at first floor). Another factory rented 1-2 of above 5-storey building as production and one flat as warehouse. Related factories were belonged to different stockholders and independent operation. Independent business licenses and lease contracts were provided for audit. Per onsite observation, management and workers interview, no production business relation, co-mingle management and worker with another factory was found. This audit scope did not include another factory in the same boundary.
- 2) The auditee mainly received order and exported via Shenzhen KONCAI Aluminum Case Ltd.(深圳市港彩包装制品有限公司). Because Shenzhen KONCAI is the major shareholder to the auditee and no formal English factory name for the auditee, the auditee used the English factory name as KONCAI Aluminum Case Ltd. for business activities all through. The factory management confirmed to use the English factory name as "KONCAI Aluminum Cases Ltd." for this audit.
- 3) The address on business license is as "(3-5/F Qingyuan Diaobao Electric Appliances Co., Ltd.) No. 8, Science and Technology Industrial Zone, High-Technology District, Qingyuan City, Guangdong Province, China(清远市高新区科技工业园8号(清远市雕堡电器有限公司三至五层))", but actually the factory used the address of No.8, High-Technology Zone, PiKen Village, QingYuan City, Guangdong Province, China for business activities, two addresses were indicated same location. The factory management confirmed to use the address as "No.8, High-Technology Zone, PiKen Village, QingYuan City, Guangdong Province, China" for this audit.

**Ratings Summary**

**Auditee's background information**

Auditee's name :	<b>KONCAI Aluminum Cases Ltd.</b>	Legal status :	<b>Co., Ltd.</b>
Local Name :	清远雕堡电器有限公司 (9144180207023913X0)	Year in which the auditee was founded :	<b>2013</b>
Address :	<b>No.8, High-Technology Zone, PiKen Village</b>	Contact person (please select) :	<b>Susy Li</b>
Province :	<b>Guangdong</b>	Contact's Email :	<b>susy@koncai.com</b>
City :	<b>Qingyuan</b>	Auditee's official language(s) for written communications :	<b>Chinese</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>N/A</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>N/A</b>
GPS coordinates :	<b>N23°34'27", E113°6'12"</b>	Total turnover (in Euros) :	<b>7500000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>85.00</b>
Industry :	<b>Textiles, clothing, leather</b>	Of which domestic market % :	<b>15.00</b>
If other, please specify :		Production volume :	<b>50000-60000 pieces per month</b>
Product Group :	<b>other soft goods (please specify)</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :	<b>Cosmetic Cases &amp; Bags</b>	Lost time injury calculation cost :	<b>Yes</b>
Product Type :	<b>Cosmetic Cases &amp; Bags</b>		

**Auditee's employment structure at the time of the audit**

Total number of workers :	<b>96</b>	Total number of workers in the production unit to be monitored (if applicable) :	<b>0</b>
	<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>	
Permanent workers	<b>56</b>	<b>40</b>	
Temporary workers	<b>0</b>	<b>0</b>	
In management positions	<b>3</b>	<b>1</b>	
Apprentices	<b>0</b>	<b>0</b>	
On probation	<b>0</b>	<b>0</b>	
With disabilities	<b>0</b>	<b>0</b>	
Migrants (national citizens)	<b>42</b>	<b>30</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>56</b>	<b>40</b>	
Production based workers	<b>0</b>	<b>0</b>	
With shifts at night	<b>1</b>	<b>0</b>	
Unionised	<b>0</b>	<b>0</b>	
Pregnant	<b>-</b>	<b>0</b>	
On maternity leave	<b>-</b>	<b>0</b>	

**Finding Report**



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

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: D

Deadline date:30/06/2018

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee established BSCI management system including plan-do-check-action cycle. The auditee has established the BSCI policy and procedures. For example, the procedures on hiring, dealing with grievances, training workers, promoting ethical behaviour were established by the factory. Mr. Xiong Shuguang/Production Manager was BSCI representative and took whole charge of BSCI affairs in the factory. The auditee also established policy with respect to the selection, management and monitoring of its own significant business partners. The auditee conducted the internal audit on 28 Mar., 2017 and management review on 20 Apr., 2017. However, gaps had been identified in implementation:

被审核方已建立BSCI管理系统, 其中也包括计划~执行~检查~改善循环。受审核方建立了BSCI方针和程序, 例如程序中包括招聘, 申诉系统, 员工培训, 反腐败等内容。熊曙光/生产经理被指定为BSCI负责人, 统筹整个工厂的BSCI事务。被审核方还创建了供应商和分包商的筛选程序, 在选择供应商和分包商时, 被审核方同样考虑到了其社会责任表现。被审核方于2017年3月28号进行了内审和2017年4月20号进行了管理评审。但是发现工厂在系统执行方面和BSCI要求有差距:

- 1.1 -** The factory did not establish effective BSCI management system to implement BSCI Code of Conduct and legal requirements.1) Based on management interview and document review, the factory did not establish internal supervision system to on-going monitor its social performance and correct the identified findings. 2) Based on onsite observation, the management system was not perfect which led to some findings were identified in the performance area of Health and Safety, Protection of the Environment etc. 3) Based on workers interview, they confirmed some issues in health and safety, such as no pre-job, on-service and off-service occupational health examination etc.

工厂未建立有效的管理体系来执行BSCI的行为守则及法律法规的要求。1) 根据管理层访谈和文件审核, 工厂没有建立内部的监管系统去确保其绩效并改进识别到的问题。2) 根据现场审核, 工厂的管理体系不完善导致此次审核健康安全、环境保护等方面有发现问题。3) 根据工人访谈, 他们确认了健康安全中的一些问题, 例如没有岗前, 在岗和离岗的职业病体检等。

- 1.4 -** The factory established capacity and cost management procedure, but the factory didn't have a good capacity planning to meet the expectations of the delivery order led to workers had excessive monthly overtime work in Nov., 2016 to Nov., 2017 all through.

工厂有建立产能和成本的管理程序, 但工厂没有一个完善的产能计划去完成预期的订单交货以致于员工在2016年11月到2017年11月都有月加班超时。

**Remarks from Auditee:**

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

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: B

Deadline date:30/08/2018

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee has ensured worker involvement via detailed procedures and trainings on worker and worker representation and grievance mechanism. Satisfactory evidence has shown that there were two freely-elected worker representatives. Meeting records showed that management exchanges information on workplace-related issues with workers and their representatives once per two months. The last meeting was conducted in 16 Oct., 2017. An annual training plan was established. Training record on health, safety, work rule and working skills which provided for employees were documented.

被评估工厂通过详细的程序确保了工人参与, 及对工人和工人代表进行申诉机制培训。令人满意的证据表明, 有两名自由选举的工人代表, 会议记录显示管理人员与员工代表每两个月就工作场所相关事项进行一次沟通。最近的会议在2017年10月16号进行。工厂建立年度培训计划。工厂对员工的健康、安全、厂规和工作技能进行了培训, 且保存了培训记录。

- 2.2 -** The factory didn't define long term goals to protect workers according to the BSCI values and principles or its BSCI performance, including 1) How to reduce overtime hours and improvements of social insurance compliance etc, 2) There was no evidence reflect a step-by-step approach toward sustainable improvements.

工厂没有根据BSCI使命或愿意或其BSCI表现去定义长期的目标去保护员工, 包括1)比如降低加班时间和提高社保参保等。2)没有证据显示工厂如何逐步达到该目标。

**Remarks from Auditee:**

**Performance Area 3 : The rights of Freedom of Association and Collective Bargaining**

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee has set procedure to protect the right of workers to form and join organizations of their own choosing. There were 2 workers representatives freely elected in 12 Apr., 2017. According to interview with workers representative, there was no discriminatory treatment from factory management. Also there was no any restriction of workers representatives interaction with workers according to employee manual and testimony of interviewees. Workers representatives were allowed to carry out their duties within working hours without losing pay or other negative repercussions. Workers representatives could hold negotiation with factory management regarding issues of health and safety, welfare and work condition.

被审核方制定了相应的程序文件来确保员工可以自由成立或者参与各种组织。工厂在2017年4月12号成立了员工选举的2名员工代表。员工代表表示从未受到过管理层的差别待遇。根据员工手册及受访者口述, 工厂没有设置任何制止员工与员工代表接触的措施。员工代表可以在工作时间内行使其职责而不会被克扣工资或者产生任何负面影响。员工代表可以与管理层就健康安全, 员工福利及工作条件等方面进行谈判。

**Remarks from Auditee:**

#### Performance Area 4 : No Discrimination

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

##### GOOD PRACTICES:

##### AREAS OF IMPROVEMENT:

No discrimination in the auditee. The auditee has established Non-discrimination policy and procedure. Workers came from different provinces of China. During worker interviews, it was found that there was no unequal, abuse, unusual disciplinary practices, and there were no preference on the religion, origin, political affiliation or age, gender or social background.

被审核方里没有歧视，工厂已建立了禁止歧视程序，工人来自中国的不同的省份。在员工访谈中，员工反映在工厂里没有不平等，虐待，不寻常的纪律处分，且没有对宗教，出身，政治派别或年龄，性别或社会背景有偏见。

##### Remarks from Auditee:

#### Performance Area 5 : Fair Remuneration

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: C

Deadline date:30/10/2018

##### GOOD PRACTICES:

##### AREAS OF IMPROVEMENT:

The auditee established compensation policy according to local legal requirement. The local legal minimum wage document was collected. 12 months payroll from November 2016 to October 2017 were provided for review, 12 samples worker were elected randomly from the payrolls, the legal minimum wage was RMB1210 per month equivalent to RMB 6.95 per hour since 1 May 2015. The minimum wage of workers for regular working time paid in the company is RMB8.63 per hour. 150%, 200%, 300% of normal rate would be compensated for overtime on normal working days, Saturday and holidays. Workers were paid on hourly rate by cash at 30th of following month. Annual leave was provided in the Spring Festival holiday. Payslip was provided to the workers before the paid date. Benefit such as sick leave was defined in the factory rules, and workers could apply the paid sick leave if needed. No illegal deduction from wage was identified. However, gaps had been identified in implementation:

被审核方根据法律要求建立了工资福利政策，收集了当地法定最低工资文件。工厂提供了从2016年11月至2017年10月的12个月的工资表，随机抽出了12名员工进行审核，当地最低工资在2015年5月1号以后是人民币1210元每月（合人民币6.95元每小时），工厂支付给工人的最低工资为8.63元每小时。员工延长工作时间，周末时间以及节假日加班时可以获得正常工资的150%，200%和300%的加班工资。工厂所有员工按照时薪计算工资，在下月30号现金结算上月工资。员工的带薪年假会在春节期间提供给员工。工会会在工资发放之前获得工资条，病休假等已在工厂规章制度中予以规定，员工可以根据需要申请。没有发现工厂存在违规扣款。但是发现工厂在系统执行方面和BSCI要求有差距：

**5.4 -** The factory did not know how to collection and calculation the fair remuneration, did not know how to identify possible gaps existing between the actual remuneration and the fair remuneration figure, and take potential actions to fill the gap yet.

工厂不知道公平需求工资，也不知道信息如何收集和计算，也没有识别其实际支付的工资和公平需求工资之间的差距，并支付公平需求工资。

**5.5 -** The factory did not provide social insurance to all workers as per legal requirement. Based on provided social insurance payment records of Dec., 2017, there was 96 employees in factory, but the factory only provided all 5 types of social insurance including retirement, medical, injury, maternity and unemployment insurance to 30 employees. Commercial accident insurance was provided to other 30 employees (Contract signed with PICC INSURANCE COMPANY OF CHINA LTD. and valid period from 18 Apr., 2017 to 17 Apr., 2018). Reference Law: Labor Law of the People Republic of China (1994), Article 72&73

工厂未按照法规要求给所有员工提供社保。根据工厂提供的2017年12月的社会保险缴费记录，工厂有96名员工，工厂只提供30名员工包括养老、医疗、工伤、生育和失业保险的五险的社保。商业意外险提供给另外30名员工(和中国人寿保险股份有限公司签订合同，保险期间为2017年4月18号到2018年4月27号)。参考法律法规：中华人民共和国劳动法（1994）72和73条。

##### Remarks from Auditee:



## Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: D

Deadline date:30/08/2018

### GOOD PRACTICES:

### AREAS OF IMPROVEMENT:

The auditee established working hours policy according to local legal requirement. Normal working hour was 8 hours per day and 5 days per week. Working time was 8:00-12:00, 13:30-17:30 for all production workers. Fingerprinting attendance machine was used to record workers' working time. Time records from December 2016 to audit date were provided and 12 samples were randomly selected for review. normally 2 hours overtime at weekdays, workers usually worked overtime 8 hours on Saturday. Maximum overtime 14 hours per week and at least 1 day off after 6 days consecutive working days was guaranteed. During the worker interview, workers confirmed that they worked overtime voluntarily. No OT was arranged on Sunday and statutory holiday during the period this audit covered. However, gaps have been identified in implementation.

被审核方根据法律要求建立了工作时间的政策。正常工作时间为每天8小时，每周5天。工作时间为所有生产工人8:00-12:00，13:30-17:30。指纹考勤机用来记录员工的工作时间。2016年12月至审核日的考勤已提供，并抽样了12名员工的考勤。正常工作日一般加班2小时，通常周六加班8小时。每周最大加班14小时，每周有一天休息。员工访谈确认，加班自愿。在审核覆盖期间段，没有在星期天和假日加班的情况。然而，发现工厂在实施中仍存在与该执行领域要求之间的差距。

- 6.2 -** The factory didn't have effective system to control its overtime work compliance. Reference law: China Labour Law, article 41 -1)The working hour record system couldn't alert when overtime near or over the limits. 2)Based on management interview, the factory arranged the overtime according to the production order, they did not control the overtime effectively. 3)Based on workers interview, they would be arranged overtime if necessary, they didn't know the overtime limit and how to control. 4)Selected three months of sampled 12 workers' attendance records of past 12 months to be reviewed, excessive monthly overtime work observed. All 12 workers' monthly OT exceeded 36 hours, up to 48 hours in Oct., 2017; all 12 workers' monthly OT exceeded 36 hours, up to 62 hours in Jul., 2017; all 12 workers' monthly OT exceeded 36 hours, up to 58 hours in Mar., 2017. Remark: The monthly overtime hours were in line with legal requirement from 1 Dec. 2017 to the audit day(11 Dec., 2017), up to 24 hours so far.

工厂没有有效的系统去控制加班，参考法律法规：中华人民共和国劳动法第四十一条 因为以下原因： 1)工厂的考勤系统没办法预警当其加班时间快超过或已经超过要求时，2)根据管理层访谈，工厂根据生产订单安排加班，没有有效的控制加班，3) 根据工人访谈，有需要就会安排加班，他们不清楚加班的上限和如果控制加班，4)根据过去12个月抽样的12名员工3个月的考勤记录显示，有月加班的情况： 所有12名工人在2017年10月的月加班超过36小时，最大达到48小时；所有12名工人在2017年7月的月加班超过36小时，最大达到62小时；所有12名工人在2017年3月的月加班超过36小时，最大达到58小时。备注：目前工厂2017年12月1号到审核当天（2017年12月11号）的月加班时间符合法律要求，目前达到24小时。

### Remarks from Auditee:



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

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:30/06/2018

**GOOD PRACTICES:**
**AREAS OF IMPROVEMENT:**

No transportation was provided to workers. The factory has established an effective system regarding health and safety and appointed one senior manager named Ms. Xiaoying Xu/Admin. Supervisor to be responsible for the health and safety affairs. All necessary fire equipment such as fire extinguishers, fire alarms and fire hoses were installed in the workshops and dormitory. These facilities were checked monthly. First aid boxes were placed in the workshops and dormitory. The factory provided clean potable water for all employees. Employees have the right to remove themselves from imminent danger without seeking permission from the company. The factory regularly provides OHS training to ensure workers understand the rules of work., personal protection a measures for preventing and reacting to accidents. The last training was conducted in 15 Nov., 2017. Fire evacuation drill was conducted twice per year in workshops and dormitory, the last fire drill was conducted in 29 Nov., 2017. There were 2 trained first aiders in the factory. The factory obtained valid annual safety inspection report and certificate for one elevator. The factory obtained occupational hazard factors monitoring report issued on 8 Sep.,2017 by Shenzhen Zhongzhen Testing Technology Co., Ltd. Tidy and clean dormitory and canteen was provided for workers. However, gaps have been identified in implementation.

工厂没有提供交通班车给员工。工厂建立了有效的员工健康和安全体系，并任命一位高级管理人员许小英小姐/行政主管负责健康和安全事务。所有必须的消防设施，如灭火器、消防栓及消防警铃都安装在各车间和宿舍，消防设施每月检查一次。车间和宿舍配置了急救药箱。工厂提供了清洁的饮用水给所有员工。员工有权利在遇到使自己远离即时发生的危及自身安全的严重危险，而不需要公司的事前准许。工厂定期提供职业健康与安全培训，以确保工人理解工作规则、个人防护、防止意外及如何应对意外的措施。最近的培训在2017年11月15号。每年在车间和宿舍进行两次消防疏散演习，最近一次在2017年11月29号进行。工厂有2名培训的急救员。工厂有获得1台电梯的年检报告和证书。工厂获得了2017年9月8号深圳市中圳检测技术有限公司出具的职业病危害因素监测报告。干净卫生的宿舍和饭堂有免费提供给员工。然而，发现工厂在实施中仍存在与该执行领域要求之间的差距。

**7.1 -** The factory did not provide pre-job, on-service and off-service occupational health examination to the workers contacting with hazardous chemicals, such as glue spraying workers. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases (2016) , Article 35

工厂未提供岗前，在岗和离岗职业病体检给所有暴露于职业病风险岗位，如接触危险化学品的喷胶工人。参考法律法规：《中华人民共和国职业病防治法》（2016）第三十五条。

**7.2 -** There were only 60 out of 96 employees had participated in employment injury insurance including 30 in social insurance and 30 in commercial accident insurance. Reference law: Social Insurance Law of the People's Republic of China, Article:33.

工厂96个员工中只有60人参加了工伤保险，包括30人的社保和30人的商业意外险。参考法律法规：中华人民共和国社会保险法，第三十三条

**7.6 -** The PPE (active carbon mask) usage sign was not post in assembly workshop used chemical of cleanser. Proper PPE was provided by the factory and used by the workers. Reference Law: Code of Occupational Hazard Notification and Warning Sign Management for Employer, Article 13.

组装车间使用抹机水没有张贴劳保用品（活性炭口罩）使用标示。恰当的劳保用品工厂有提供，工人有佩戴。参考法律法规：用人单位职业病危害告知与警示标识管理规范第十三条

**7.7 -** No MSDS was provided for the chemicals of cleanser used in assembly workshop at 2/F. Reference Law: Regulations on Safety Use of Chemicals in Workplaces (1996), Article 12.

工厂2楼组装车间使用的抹机水没有提供MSDS。参考法律法规：工作场所安全使用化学品规定 第十二条

**7.8 -** The emergency procedures were established, but the factory had not visually displayed emergency procedures to exposed workers and first-aid personnel in the factory.

应急处理程序有建立，但工厂没有在厂区张贴应急处理程序以供员工和急救人员使用。

**7.9 -** It was noted that there was position with occupational disease hazards during production process in the factory (e.g. glue spraying position).

However, no warning sign of occupational disease hazards was posted for this position. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24

审核时发现工厂生产过程中有可能产生职业病的岗位（例如：喷胶岗位）。但是未在这些岗位处设置合适的职业病危害警示标识。参考法律法规：中华人民共和国职业病防治法 第二十四条

**Remarks from Auditee:**
**Performance Area 8 : No Child Labour**

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

**GOOD PRACTICES:**
**AREAS OF IMPROVEMENT:**

The policy of recruiting was set up by the factory. And it regulated that the factory would not recruit workers under 16. The factory checked workers' ID during recruiting and HR specialist knew the skills of asking workers' experience and ages when he had any doubt of workers' ID card or age according to interview with HR specialist. Meanwhile, the factory established remediation measure of child labor in order to set up measure of recruiting child labor incidentally. After checking all personnel files of workers, no child labor was identified in the factory.

工厂制定了合适的招聘政策并规定不会雇佣低于16周岁的员工，员工入职时工厂均会查看员工的身份证并且当人事专员对员工年龄有怀疑时，会通过有技巧地面谈以核实员工情况。同时工厂制定了童工补救措施以防万一发现童工的应对措施。在审核过程中，通过查阅所有员工的人事资料，未发现有任何童工存在。

**Remarks from Auditee:**

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

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

**GOOD PRACTICES:**
**AREAS OF IMPROVEMENT:**

The factory established necessary mechanisms to prevent, identify and mitigate harm to young workers. There was no young worker in this factory. The youngest worker born on 2 May., 1998 and joined the factory on 5 Sep., 2017 was over 19 years old. There was no young worker in the past year.

工厂建立了必要的管理机制来识别未成年工，防止或者减少对于未成年工的伤害。工厂没有未成年工。最年轻的员工生于1998年5月2号和2017年9月5号加入工厂，已满19岁。

**Remarks from Auditee:**
**Performance Area 10 : No Precarious Employment**

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:28/02/2018

**GOOD PRACTICES:**
**AREAS OF IMPROVEMENT:**

Labor contracts were all concluded between the factory and workers. The contracts statement included the description of working hours, wage, training, rest time and leave etc. which were in accordance with legal requirement and ILO. Meanwhile, the factory provide a copy of contract to every worker. Based on interview statement of workers, workers understood well of the content of labor contract and no illegal employment was identified during the audit. However, gaps have been identified in implementation.

工厂和每个员工均签订了劳动合同，劳动合同的内容包括工时，工资，培训，休息时间和假期等，这些内容均符合法规以及国际标准。同时工厂提供了一份劳动合同副本给员工。通过员工访谈，员工均了解劳动合同内容，审核过程中，工厂无不合法用工形式存在。然而，发现工厂在实施中仍存在与该执行领域要求之间的差距。

**10.2** - It was noted that no occupational hazards notification for relevant operators was in place, such as glue spraying workers etc. Reference Law: Article 33 of Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2016 ).

工人劳动合同审核发现，工厂没有对有害岗位进行职业危害告知，如喷漆工等，参考法律法规：中华人民共和国职业病防治法（2016）第三十三条

**Remarks from Auditee:**
**Performance Area 11 : No Bonded Labour**

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

**GOOD PRACTICES:**
**AREAS OF IMPROVEMENT:**

The factory has established the no bonded labour management procedure, there was no any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour. The factory only checked candidate's original ID card and kept the copy. The factory prohibited any misconduct that receiving deposit or other unreasonable fee, and the uniform, and PPE were provided to workers for free. Employees could freely go outside of factory after off-duty. Overtime was voluntary. According to interview with management and supervisors, they were all aware of the procedures regarding anti-bonded labour. Workers were not subject to inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse according to interviewed workers.

工厂建立了无抵债劳动管理程序。现场无任何形式的奴役，强迫，抵债，契约，买卖和非自愿劳工。工厂只会检查候选人的身份证原件并留复印件。工厂禁止任何收取押金和其他不合理费用的行为，厂服和PPE将免费提供给员工。员工下班后能自由走出工厂。加班自愿等。管理人员和现场主管均表示知晓反强迫劳工的相关管理规定。受访员工表示未受到任何非人道待遇，以及体罚，精神及身体虐待和语言辱骂等。

**Remarks from Auditee:**

## Performance Area 12 : Protection of the Environment

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: B

Deadline date:28/02/2018

### GOOD PRACTICES:

### AREAS OF IMPROVEMENT:

The factory established environment protection policy. Pollutant Discharging License, EIA and approval were obtained. The factory periodically identified its significant environmental impact. The factory established documented risk assessments that justify management decisions on water use and awareness and plan raising on water waste reduction. However, gap has been identified in implementation.

工厂建立了环境保护的政策。工厂有获得排污许可证，环评和批复。工厂有定期进行环境影响因素的识别。工厂有建立风险评估来识别水消耗的管理，并建立了节约用水的意识和计划。然而，发现被审核方在实施中仍存在与该章节要求之间的差距。

**12.2** - The auditee did not collect the related environmental laws standards. E.g. Environmental Protection Law of the People's Republic of China (2014).

工厂没有收集环保相关的法律和标准，如《中华人民共和国环境保护法》(2014修订版)

**12.4** - 1)The factory did not transfer the hazardous wastes(such as waste chemical containers and etc.) to the licensed vendor for disposing. Reference law: Law of the People's Republic of China on the Prevention and Control of Environmental Pollution by Solid Wastes (2013) Article 57. 2)The factory did not supervise its waste air emission on periodic basis, such as the waste air from glue spraying. Reference law:Measures for the Administration of Environmental Surveillance , Article 21

1)工厂未将其产生的危险废弃物(如废化学品空桶等)转移给有资质公司处理。参考法律法规：中华人民共和国固体废物污染环境防治法（2013修正）第五十七  
条 2)工厂未监测其废气的排放，以确保其达标排放，如喷胶排放的废气。参考法律法规：环境监测管理办法第21条

### Remarks from Auditee:

## Performance Area 13 : Ethical Business Behaviour

Full Audit [Audit Id - 113872] Audit Date: 11/12/2017 PA Score: A

Deadline date:

### GOOD PRACTICES:

### AREAS OF IMPROVEMENT:

The auditee established anti-bribery policy and procedure. The procedure included handling any act of corruption and identified where the major risks of corruption could occur. Based on site tour, interview and document review, no any corruption behavior was found. The auditee established a procedure to protect confidentiality of personal private information.

被审核方建立了反贿赂政策和程序。程序包括处理腐败行为和主要风险发生点。基于现场走访，访谈和文件审核，没有发现腐败行为。工厂建立了保护个人隐私信息的程序。

### Remarks from Auditee:

**Summary**

Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	11/12/2017	113872	D	B	A	A	C	D	A	A	A	A	A	B	A	C

Producer Photos



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



Photo of fire safety equipment  
Safety exit with emergency light and exit sign.JPG



Photo of the inside of the main production hall  
Materials warehouse.JPG



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



Photo of non-conformity  
5.5-The factory did not provide social insurance for all workers.JPG



Photo of the inside of the main production hall  
Packing.JPG



External photo(s) of the production unit(s)

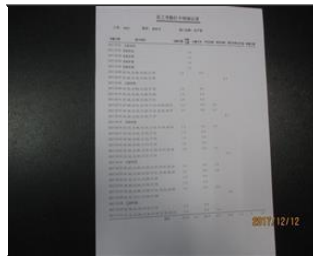


Photo of non-conformity  
6.2-NC-Monthly OT exceeded legal requirement.JPG



Photo of the inside of the main production hall  
Sample making.JPG



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



Photo of non-conformity  
7.6 and 7.7-NC-No PPEs sign and MSDS for cleanser.JPG



Photo of the inside of the main production hall  
Sewing.JPG



Photo first aid facilities  
Eyes washing facility.JPG



Photo of the canteen (if applicable)  
Canteen.JPG



Photo of the inside of the main production hall  
Wood machining.JPG





Photo first aid facilities  
First aid kit.JPG



Photo of the canteen (if applicable)  
Kitchen.JPG



Photo of the personal protection equipments (if applicable)  
PPEs sign.JPG



Photo of chemical storage room (if applicable)  
Chemical warehouse.JPG



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



Photo of the personal protection equipments (if applicable)  
Proper PPEs.JPG



Photo of chemical storage room (if applicable)  
MSDS.JPG



Photo of the inside of the main production hall  
Assembly.JPG



Photo of the sanitary facilities  
Drinking water.JPG



Photo of fire safety equipment  
Emergency assembly point.JPG



Photo of the inside of the main production hall  
Attendance recorder.JPG



Photo of the sanitary facilities  
Toilet.JPG



Photo of fire safety equipment  
Evacuation indication.JPG



Photo of the inside of the main production hall  
Cutting.JPG



Photo of the dormitories (if applicable)  
Bedroom in dormitory.JPG



Photo of fire safety equipment  
Evacuation plan.JPG



Photo of the inside of the main production hall  
Electrical panel.JPG



Photo of the dormitories (if applicable)  
Dormitory building.JPG



Photo of fire safety equipment  
Fire alarm.JPG



Photo of the inside of the main production hall  
Finished goods warehouse.JPG



Photo of the dormitories (if applicable)  
Fire fighting facilities in dormitory.JPG



Photo of fire safety equipment  
Fire extinguisher and hydrant.JPG



Photo of the inside of the main production hall  
Glue spraying.JPG



Photo of the dormitories (if applicable)  
Shower and toilet room.JPG



Photo of fire safety equipment  
Fire hydrant testing.JPG