

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. 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.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & Entitlement to Work
 - 2: Freedom of Association and Right to Collective Bargaining are Respected
 - 4: Child Labour Shall Not be Used
 - 5: Legal Wages are Paid
 - 5.A: Living Wages are Paid
 - 6: Working Hours are Not Excessive
 - 7: No Discrimination is Practiced
 - 8: Regular Employment is Provided
 - 8.A: Sub-contracting and Homeworkers are Used Responsibly
 - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

1. Labour Standards Code Areas
 - As 2-pillar
2. Health & Safety Code Area
 - As 2-pillar
3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
 - 10.C: Business Ethics

- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

Audit and site details

Audit details

Sedex company reference	ZC421777042	Auditor company name	SGS_China
Date of audit	2025-02-17	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics		

Site details

Sedex site reference	ZS421804313	Site name	YUHUAN TAIZE PLUMBING FITTINGS CO LTD
Business name	YUHUAN TAIZE PLUMBING FITTINGS CO LTD	Site address	317607 South of No.1 , North Huihai Road, Bingang industry zone, Shamen Town, Yuhuan City, Zhejiang Province 浙江省玉环市沙门镇滨港工业城惠海北路1号南面, Taizhou, CN
Site phone	15858661074	Site email	3382262977@qq.com

Audit parameters

Time in and out	Day 1		Day 2	
	In	12:00	In	08:30
	Out	16:00	Out	16:30
Audit type	Periodic			
Was the audit announced?	Semi announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	蔡琬谊 / 副总			
Any conflicting information SAQ/Pre-Audit Info	No			
Is further information available?	No			

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no union in the factory.		
Reason for absence during the audit	There was no union in the factory.		
Reason for absence at the closing meeting	There was no union in the factory.		

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

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.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

This audit is semi-announced with 4 week windows (from Feb 13, 2025 to Mar 13, 2025).

Lead auditor

Eva Xin

APSCA Number

32201009

Additional auditor

Date of declaration

2025-02-18

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	蔡琬谊
Title	副总
Date of declaration	2025-02-18

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC ZAF600806004
	3.H Where identified as necessary to reduce r...	§2	NC ZAF600806005
	3.A Ensure a safe working environment. Put in...	§3	NC ZAF600820283
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600820284
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§5	NC ZAF600806006
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§6	NC ZAF600806007
10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§7	NC ZAF600806008
	10.A.B Comply with relevant local, regional a...	§8	NC ZAF600820285
	10.A.B Comply with relevant local, regional a...	§9	NC ZAF600820286

Local law issues

§1	Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 20 An entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, fire fighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightning-proof, static-proof, antiseptis, and anti-leakage (i.e. protection dams and segregated operations) safety facilities or equipment, , etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.
§2	Production Safety Law of the People's Republic of China (2014 Amendment), Article 42 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules.
§3	Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results. The expenses for the occupational medical examination shall be assumed by the employer. Employers shall not assign employees who have not undergone the pre-job occupational medical examination to operations with exposure to occupational hazards; shall not assign employees with occupational contraindications to operations causing such contraindications; shall transfer employees who are found during occupational medical examination to have suffered health injuries related to their jobs from such jobs and settle such employees appropriately; and shall not rescind or terminate labor contacts with employees who have not undergone the off-the-job occupational medical examination. The occupational medical examination shall be conducted by medical health institutions that has obtained the Medical Device Practice License....
§4	National Safety Technical Code for Electric Equipments (GB 19517-2009) , Article 2.2 Preventive measure against the hazard of electric shock Insulation protective technology, direct/indirect touching protective technology, and so on could be adopted to provide adequate protection for electric shock hazard of electric equipments, which work in normal application, caused by direct effect of electrical energy. Article 2.2.1 To ensure smooth operation and prevent hazard from direct effect of electric current, electric equipments must be with adequate electric insulation performance including insulation resistance, electric strength, quality of thermal endurance, moisture-proof, filthiness-proof, flame resistance, and tracking resistance, and so on. Article 2.2.3 To prevent accidental contract with live parts, electrical equipment structure and/or housing can be used, or the device can be placed in a closed electrical work field. The parts used to prevent direct contact are only allowed to be removed or opened by means of tools.... General Guide for Safety of Electric User (GB/T 13869-2017), Article 5.1.2 The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring, they shall be installed per the specific products standard
§5	Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.

§6	Labor Law of the People's Republic of China (2018 Amendment), Article 41 The employing unit 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.
§7	Atmospheric Pollution Prevention and Control Law of the People's Republic of China (2018 Amendment), Article 7 Enterprises, public institutions, and other business entities shall take effective measures to prevent or reduce atmospheric pollution and shall assume legal responsibility for the damage they have caused. ... Article 20 Enterprises, public institutions, and other business entities discharging pollutants to the atmosphere shall set atmospheric pollutant discharge outlets according to the laws, regulations, and the provisions of the competent department of ecology and environment under the State Council. It is prohibited to discharge atmospheric pollutants by means of evading supervision such as secretly discharging pollutants, altering or forging monitoring data, suspending production for the purpose of evading on-site inspection, opening emergency discharge channels under non-emergent situations, or operating atmospheric pollution prevention and control facilities in an abnormal manner.
§8	Law of the People's Republic of China on Noise Pollution Prevention and Control (2021 Amendment), Article 38 Units that implement pollutant discharge permit management shall, in accordance with regulations, conduct self-monitoring of industrial noise, keep original monitoring records, disclose monitoring results to the public, and be responsible for the authenticity and accuracy of monitoring data. Key noise pollutant discharge units shall, in accordance with state regulations, install, use, and maintain automatic noise monitoring equipment, and network with the monitoring equipment of the ecological environment authority.
§9	Atmospheric Pollution Prevention and Control Law of the People's Republic of China (2018 Amendment), Article 18 When building projects that have an impact on atmospheric environment, enterprises, public institutions, and other business entities shall conduct environmental impact assessments and publish the environmental impact assessment documents according to the law; when discharging pollutants to the atmosphere, they shall conform to the atmospheric pollutant discharge standards and abide by the total quantity control requirements for the discharge of key atmospheric pollutants.

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly	✔	✔	✔	✔
9. No harsh or inhumane treatment is allowed	✔	✔	✔	✔
10.A. Environment 2-Pillar	ⓘ	ⓘ	⚠	⚠
10.C. Business ethics	✔	✔	✔	✔

- ✖

Not addressed
- ⚠

Fundamental improvements required
- ⓘ

Some improvements recommended
- ✔

Robust management systems

Site details

Company and site details

Sedex company reference	ZC421777042	
Sedex site reference	ZS421804313	
Company name	YUHUAN TAIZE PLUMBING FITTINGS CO LTD	
Business ownership type	GOODS	
Site name	YUHUAN TAIZE PLUMBING FITTINGS CO LTD	
Site name in local language	玉环太泽水暖制品有限公司	
GPS location	GPS address	South of No.1 , North Huihai Road, Bingang industry zone, Shamen Town, Yuhuan City, Zhejiang Province
	Coordinates	Latitude: 28°14'27" N; Longitude: 121°23'46" E. Remark: 1. The total land area occupied was approx. 8000 sq. meters. 2.The factory rented one 2-story comprehensive building for workshop, warehouse and office from Anren Village Joint-Stock Emergency Cooperative in Shamen Town, Yuhuan City (part of the storefront along the street on the first floor is used by other individuals, and some area of about 350 square meters is used by other individuals. During this audit, the factory provided relevant lease contract and business license for review, the audit only covered the areas used by the audited factory. No worker, management, warehouse or equipment sharing was noted.
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr.Cai Wanyi
	Job title	Deputy director
	Phone number	15858661074
	Email	3382262977@qq.com

Company and site details

Applicable business and other legally required business license numbers and documents

Business license number: 91331021677218028D Valid time was from Jul 2, 2008 to long term.

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of domestic appliances
	Secondary	
	Other	
Product type	The factory was manufacturing radiator fittings.	
Process overview	Products: Radiator fittings. Activities: Raw materials -> Cutting-> Metal working-> Spray plastic -> Assembly and Packing ->Finished goods. Equipment: spray plastic machines(1 unit), cutting machines (3 units) and etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	No Based on site observations, management interviews, and employee interviews, it was confirmed that the factory used only partly area of the 1F and 2F of one buildings in the park, and that the other buildings in the area were used by other factories.
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Site scope

Building 1	Last construction works on site	2017
	If building is shared, provide details	Partly area used by the audited factory, the rest area used by the other factory.
	Number of floors	2
	Description of floor activities	1F: Partial areas used as warehouse, cutting and metal working workshops by the audited factory, partial areas rented to personal used as store and workshop, some areas used by other individual for workshops. 2F: Used as office, spray plastic workshop, assembly and packing area by the audited factory.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No	
Does the site organise worker transport to the worksite?	Not applicable	
	The factory does not provide accommodation or transportation, because employees are living at home or renting a room near the factory, to solve their own transportation to and from work.	

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	25-50%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night or back shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No
No, the site has not assessed for negative impacts on the human rights, lands, resource territories, livelihoods or food security of indigenous peoples or the local community.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
No, no Human Rights Impact Assessment (HRIA) was ever conducted at this site.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	10 (35.7%)	18 (64.3%)	- -	28 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	10 (35.7%)	18 (64.3%)	- -	28 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	7 (50%)	7 (50%)	- -	14 (50%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	7 (50%)	7 (50%)	- -	14 (50%)

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

Provinces as below: Guizhou, Sichuan, Hubei, etc.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 -	0 -	- -	0 (0%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	36%	64%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	0 -	0 -	- -	0 (0%)
Salaried workers	10 (35.7%)	18 (64.3%)	- -	28 (100%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	10 (35.7%)	18 (64.3%)	- -	28 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details NA

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 (100%)	0 (0%)	- -	1
Supervisors or team leaders	1 (50%)	1 (50%)	- -	2
Administrative staff	3 (42.9%)	4 (57.1%)	- -	7

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 Group of 5 workers, total 5 workers.
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes
Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) NA. No negative feedback.
What did the workers like the most about working at this site?	Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Work environment – comfort (e.g. temperature, noise or dust levels) Communication (e.g. from management) Freedom of movement Pay
Additional comments	10 sampled workers were interviewed as 5 workers in 1 group and 5 individuals. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with the working conditions at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. The workers could raise their suggestions effectively to the supervisor, factory manager, general manager or worker representative, and sometimes they had seen these suggestions used. They felt able to complain directly to their supervisors but also felt free to give their general concerns, such as working condition to worker representative who would take it to the worker management committee.
Attitude of workers' committee/union representatives	Interviews with one worker representative, he stated that managers always acted on requests. The worker representative was happy with the working conditions, and she stated that they could give suggestions on all parts of the site's practices.
Attitude of managers	The factory management agreed that the auditors could access to all facilities, compound documents and records requested by the auditors, to take photo of the factory, to copy relevant document records and to conduct confidential worker's interview. During the audit, management showed they were willing to gradually improve all issues found onsite.

Workers interviewed by type

	Total
Permanent workers	10
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0

Workers interviewed by type

Total number of workers interviewed	10
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Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	2	3	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	2	2	-	4
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	2	2	-	4

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	3.0%	1.0%	-	4.0%
Previous full calendar year (2023)	3.0%	1.0%	-	4.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	1.0%	2.0%	-	3.0%
Previous full calendar year (2023)	1.0%	2.0%	-	3.0%

* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

The factory had provided accidents records in past one year to auditor for review, there were no accident happened.

Annual number of work related accidents and injuries (per 100 workers)*

	Men	Women	Other	Total
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Annual number of work related accidents and injuries (per 100 workers)*

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	-
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

* Calculated as (number of lost days due to work accidents and work related injuries * 100) / number of total workers.

Percentage of workers that work on average more than 48 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%

Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	Current systems: • The factory management was co-operative during the audit time, and allowed by the management that photos were taken and enclosed as support evidence. The factory provided the genuine and authentic records for review. • There were no tampering or inconsistent documents found. • The Sedex SAQ was available for review, and no conflicting information was founded. • The factory had a policy, endorsed at the highest level, covering human rights impacts and issues, and ensured it is communicated to all appropriate parties, including its workers and own suppliers. • Deputy director was a designated person responsible for implementing standards concerning Human rights. Evidence examined: • Employee handbook • Business licenses of the factory and the property owner. • Procedures on social accountability • Management and worker interview		

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes All employees of the factory are directly hired.

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.The factory's "No Forced Labor Procedures Policy" policy Outlines the system for managing this issue on site, including all relevant requirements in the code area, further details of which can be found in the "Procedures". 2.The documentation clearly assigns responsibilities, processes, and handles all areas of code - they can be considered robust Mr. Cai / Deputy director specialist is in charge of execution and knows her duties. 3.Those in charge received training on forced labor and used their knowledge to develop effective processes. Such as all staff received training. The effectiveness of the training is verified and the workers are retrained every year. 4.Monitor compliance with the process by reporting to the responsible person and develop mechanisms to monitor whether the operator has implemented the process, which can be understood from the relevant training records.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification.
- The employees obtained their job by job AD or by friend's recommendation.
- The workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
- The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
- And according to onsite observation and interview statement of workers, workers confirmed that there was no any force labor exited in the factory, for example, they could resign according to legal requirement and they could leave the factory freely without being searched, etc. Besides, no inhumane or degrading treatment was found during the audit and according to interview with workers.

Evidence examined:

- Personnel files sampling review
- Resignation records sampling review
- Factory rules review
- Employee manual review
- Management and workers interviews

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. The Factory's "Recruitment and Employment Procedures" policy Outlines the system for managing this issue on site, including all relevant requirements in the code area, further details can be found in the procedures. 2. The document clearly assigns responsibilities, processes, and handles all code areas, and Mr. Cai / Deputy director specialist responsible for execution. The responsible person clearly understands his duties and strictly implements the system in the hiring process. 3. The person in charge has developed an effective process. Key personnel, such as those responsible for recruitment, were also trained. The personnel responsible for recruitment fully understood the content of the training and implemented the procedural requirements in the recruitment process. 4. By reporting to the responsible person the compliance of the relevant departments to monitor the process and developing relevant mechanisms to monitor whether the operators have implemented the process, the factory retains relevant training records. Management conducts regular spot checks on the monitored situation to ensure that no violations of procedures have occurred.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- All workers in the factory were Chinese. All workers had the proper legal rights to work in this region.
- No foreign worker was used by the factory.
- The factory has no subcontracted workers.
- The factory had established recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment.
- Based on employee interviews and document review, it was confirmed that the factory did not charge any relevant fees to the employees before, after and after their joining the factory.
- All workers were presented with terms of employment at the time of recruitment, and understand them.

Evidence examined:

- Hiring procedure
- Personnel files and labor contracts
- Worker and management interview
- The hiring and termination procedure

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	50%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Provinces as below: Guizhou, Sichuan, Hubei, etc.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?

Not Applicable

Were recruitment fees or costs identified during worker interviews?

No

NA. No recruitment fees or costs identified during worker interview.

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. The factory's "Freedom of Association Procedure" policy Outlines the system for managing this issue on site, including all relevant requirements in the area of the code, further details of which can be found in the procedure. 2.The documentation clearly assigns responsibilities, processes, and addresses all code areas - they are considered robust Mr. Cai / Deputy director specialist is responsible for execution. Those responsible fully understood their duties and were helping workers understand their right to freedom of association. 3.Those in charge received training on freedom of association and used their knowledge to develop effective processes. For example, when an employee's right to freedom of association is infringed upon, he or she can report it to the general manager, who will handle it personally. The human resources department should record the whole process. However, according to the worker interviews and document review, most of the workers, although clear and able to name the workers' representatives, lacked an accurate concept of the workers' representatives' duties. 4.The Human Resources Department is responsible for enforcing the freedom of association of employees and recording relevant incidents, which can be learned from training records and meeting minutes. The workers were present at the meeting and used their rights.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.
- 1 worker representative was available in the factory, 1 worker representative attended the opening and closing meeting during this audit.
- The worker representative meeting was conducted when needed.
- Through worker interview, the worker could raise their grievances or complaint through worker representatives or management directly.

Evidence examined:

- The policy on freedom of association
- Interview with workers and management
- Interview with worker representative and union representative
- Election and meeting minutes

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1. The factory's "Health and safety Policy" document Outlines the system for managing this problem on site, including all relevant requirements in the area of the code, further details of which can be found in the procedure. However, there is a lack of guidance on the proper placement of goods in the factory's health and safety program documentation. 2.The documentation clearly assigns responsibilities, processes, and addresses all code areas - they are considered robust Mr. Cai / Deputy director to be in charge and he knew his responsibilities. However, Mr. Cai / Deputy director neglected to pay attention to the risk of health and safety program. 3. The factory set up an EHS safety committee to communicate and train personnel in relevant positions, but it did not cover all workers and did not evaluate the training effect. The content of health and safety training of workers is not fully understood, which leads to the lack of safety awareness of some workers. 4. The factory has established and implemented relevant monitoring procedures to identify health and safety risks. However, the responsible departments failed to fully perform their monitoring duties. The frequency of health and safety inspection is insufficient, and the content is not comprehensive enough. As a result, health and safety problem was not identified and corrected in a timely manner.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.N Maintain a log of all hazardous substance...	§1	NC ZAF600806004
	3.H Where identified as necessary to reduce r...	§2	NC ZAF600806005
	3.A Ensure a safe working environment. Put in...	§3	NC ZAF600820283
	3.O Implement an appropriate electrical safet...	§4	NC ZAF600820284

Systems and evidence examined to validate this code section

Current systems:

1. General Health and Safety management
 - Mr. Cai / Deputy director was responsible for issue of Health & Safety in the factory.
 - Minutes of meetings show that there were regularly meetings between H&S committee and H&S manager.
 - Ventilation, temperature and lighting were adequate for the production processes.
 - Sufficient clean toilets segregated by gender were available at all times to workers.
 - The factory provided potable water to workers free of charge in workshop.
2. Fire Safety
 - Evacuation plans were posted in all workshops and understood by all interviewed workers.
 - The adequate emergency exits for all workshops.
 - Sufficient fire-fighting equipment such as fire extinguishers and hydrants in production building. Regular inspection was taken by the factory per month.
 - Fire drill was conducted in the factory twice per year, the records were provided for review.
3. Electrical safety
 - All parts of electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards.
 - There are qualified electricians on site and certificates are available for review.
4. Chemical safety
 - Chemical inventory list was available.
5. Medical services
 - Sufficient first aid kits in each production area and they were well stocked.
 - Sufficient first aiders were available in the factory and the certificate was provided for review.

Evidence examined:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Fire equipment maintenance records
- Training records and certificates
- Fire acceptance certificates or records
- The completion acceptance reports or records
- Fire drill records
- Trained first aider register
- Accident records
- Onsite observation
- Worker and management interview

Findings: non-compliances

ZAF600806004

Non-compliance

Due 2023-02-04

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.N Maintain a log of all hazardous substances (e.g. chemicals and pesticides) on site. Ensure that these are managed appropriately at all times in line with safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Description

Based on onsite observation, 60% of lubricating oil were not fitted with secondary containers in the factory's metal working workshop. 根据现场观察，工厂金属加工车间有60%的润滑油没有二次容器。

Description (carried over)

Based on onsite observation, 2 lubricating oil containers were not installed secondary containers at metal working workshop. 根据现场观察，工厂金属加工车间有两桶润滑油容器没有安装二次容器。

Corrective and preventative actions

The factory should install secondary containers for all chemical used and stored areas. 工厂在化学品存放和使用地方安装二次容器。

Corrective and preventative actions (carried over)

The factory should install secondary containers for all chemical used and stored areas. 工厂在化学品存放和使用地方安装二次容器。

Local law reference

Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 20 An entity producing or storing hazardous chemicals shall, according to the category and dangerous properties of the hazardous chemicals it produces or stores, set up monitoring, controlling, ventilation, sun-proof, temperature-controlled, fireproof, fire fighting, blast-proof, pressure discharging, poison-proof, neutralizing, moisture-proof, lightning-proof, static-proof, antisepsis, and anti-leakage (i.e. protection dams and segregated operations) safety facilities or equipment, , etc. at the work places, and maintain them on a routine basis according to the national standards, industrial standards or relevant state provisions so as to guarantee the normal functioning thereof.

Evidence



Chemicals without
secondary container.jpg

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ZAF600806005		Non-compliance	Due 2023-02-04
Code area	3 Working conditions are safe and hygienic	Status	Closed (2025-02-18)*
Workplace requirement	3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).	Time given to resolve	30 days
Issue title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	Verification method	Desktop audit
Description	Based on site observation, it was found that 80% metal working workers and auto assembly workers did not wear earplug who worked at loud noise condition. Although the factory had provided the necessary PPE to workers. 基于现场观察发现，工厂80%金属加工车间工人和自动装配工人作业时候没有佩戴耳塞，尽管工厂已经提供了必要的PPE给员工。	Area of non-compliance/non-conformance	Local law
Description (carried over)	Based on site observation, it was found that 80% metal working workers and auto assembly workers did not wear earplug who worked at loud noise condition. Although the factory had provided the necessary PPE to workers. 基于现场观察发现，工厂80%金属加工车间工人和自动装配工人作业时候没有佩戴耳塞，尽管工厂已经提供了必要的PPE给员工。		
Corrective and preventative actions	Factory should supervise and educate employees to wear personal protective equipment properly where applicable. 工厂应监督和教育员工佩戴好个人防护用品。		
Corrective and preventative actions (carried over)	Factory should supervise and educate employees to wear personal protective equipment properly where applicable. 工厂应监督和教育员工佩戴好个人防护用品。		

Local law reference

Production Safety Law of the People's Republic of China (2014 Amendment), Article 42 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules.

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ZAF600820283

Non-compliance

Due 2025-03-27

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Time given to resolve

30 days

Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

Inadequate occupational health inspections. Based on site observation, document review, workers and management interview, it was confirmed that the potential occupational health hazards of the factory's cutting, metal working, plastic spraying, and automatic assembly processes are dust and noise, and the factory has established an occupational health guardianship mechanism, but it has not provided occupational health for inspection of all sampled workers in the relevant positions.
职业健康检查不足。通过现场走访，文件审核，工人和管理层访谈确认，工厂下料、金加工、喷塑、自动组道工序潜在的职业健康危害是粉尘和噪音，工厂建立了职业健康监护机制，但未提供所有抽样相关岗位工人的职业健康供检查。

Corrective and preventative actions

Factory should arrange medical examinations/ occupational health checks for all the workers in hazardous situations. 工厂应为接触职业危害因素员工，定期安排健康体检。

Local law reference

Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results. The expenses for the occupational medical examination shall be assumed by the employer. Employers shall not assign employees who have not undergone the pre-job occupational medical examination to operations with exposure to occupational hazards; shall not assign employees with occupational contraindications to operations causing such contraindications; shall transfer employees who are found during occupational medical examination to have suffered health injuries related to their jobs from such jobs and settle such employees appropriately; and shall not rescind or terminate labor contacts with employees who have not undergone the off-the-job occupational medical examination. The occupational medical examination shall be conducted by medical health institutions that has obtained the Medical Device Practice License....

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ZAF600820284

Non-compliance

Due 2025-03-27

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Time given to resolve

30 days

Issue title

223 - Systemic occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

Verification method

Desktop audit

Description

The factory's electrical boxes were not locked or lacked internal covers. Based on the on-site audit, it was found that 30% of the electrical boxes in the factory was unlocked or lacked an inner cover. 工厂电箱未上锁并且缺少内盖。根据现场审核发现，工厂内有30%的电箱没有上锁并且缺少内盖。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

The factory should ensure that all electrical boxes in the workshop are marked with warning signs and are locked or fitted with internal covers.工厂应确保车间内所有电箱有警示标识，并且上锁或安装内盖。

Local law reference

National Safety Technical Code for Electric Equipments (GB 19517-2009) , Article 2.2 Preventive measure against the hazard of electric shock Insulation protective technology, direct/indirect touching protective technology, and so on could be adopted to provide adequate protection for electric shock hazard of electric equipments, which work in normal application, caused by direct effect of electrical energy. Article 2.2.1 To ensure smooth operation and prevent hazard from direct effect of electric current, electric equipments must be with adequate electric insulation performance including insulation resistance, electric strength, quality of thermal endurance, moisture-proof, filthiness-proof, flame resistance, and tracking resistance, and so on. Article 2.2.3 To prevent accidental contract with live parts, electrical equipment structure and/or housing can be used, or the device can be placed in a closed electrical work field. The parts used to prevent direct contact are only allowed to be removed or opened by means of tools.... General Guide for Safety of Electric User (GB/T 13869-2017), Article 5.1.2 The electrical wiring of electrical products shall be of sufficient insulation strength, mechanical strength, and the ability to conduct electricity of electrical wiring, they shall be installed per the specific products standard

Evidence



[Electrical box without inner cover.jpg](#)



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3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable There were no structural additions without required permits/inspections.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.The factory has established a system for managing this issue on site, including all relevant requirements in the field of the Code. Further details can be found in the procedures. 2.The program file summarizes and processes all code areas Mr. Cai / Deputy director specialist is responsible for execution and knows her duties. Over time, management structures achieve sustainability compliance. The responsible department for hiring employees clearly understands the requirements of the law and strictly implements the requirement of not using child labor. 3.The factory communicates this policy and procedure requirements to key personnel and all employees, and the details can be reflected in the training program and related risk identification procedures. Conduct regular training for personnel and workers responsible for recruitment and verify the effectiveness of training. Ensure that the personnel responsible for recruitment clearly understand the recruitment requirements and strictly implement them. 4.The factory has developed relevant policies and monitoring procedures, including during recruitment, pre-entry, post-entry, and resignation process, the factory conducts regular monitoring and assessment to identify relevant risks in the area, which can be reflected in its training records and risk identification records. The head of recruitment checks identity cards before entry, and management regularly reviews worker information to ensure that child Labour is not used.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current systems:

- The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their original copies of ID card were kept in their personnel file. And the policy stated that the factory never employed and used any child labour under the age of 16 years old.
- The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, also did not arrange young workers to hazardous post.
- Checks of all workers files showed that no child labour or young worker was identified during the audit.
- The youngest worker in the factory was 27 years old. he was born on Feb 3, 1998 and joined the factory on Feb 1, 2023.
- Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour.

Evidence examined:

- Policy on workers recruitment
- Personnel files including the ID card copies of workers
- Roster and labour contracts of all workers
- Worker and management interview

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	27
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1.The factory has established a system on "Working Hours, Payroll Management Control Procedures" that Outlines the management of this issue on site, including all relevant requirements in the code area, further details can be found in the procedures. However, there is a lack of documentation of the factory's procedures for social security contributions, for example, it is not specified how long after an employee has been employed, which could lead to potential problems with social security as the factory grows in size and the number of employees increases. 2.The factory appointed Mr. Cai / Deputy director to carry out the relevant procedures, which clearly defined responsibilities and policies, but the management structure was not in line with the relevant requirements of the region, and the responsible department have effective control to provide social security for all workers. 3.The factory trained key personnel to implement relevant requirements and communicated them to employees, but the training and communication were not validated to ensure that workers understood their relevant requirements. In this audit, it was found that some workers did not pay social security. 4. Monitoring procedures were put in place to monitor risks in terms of working hours, wages, etc., but there was no evidence that the monitoring was effective and led to systemic problems with some workers not being paid into social security.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600806006

Systems and evidence examined to validate this code section

Current systems:

- The local legal minimum wage was RMB2260/month since Jan 1,2024. RMB 2070/month since Aug 1, 2021.
- All workers' wages were calculated by monthly salary. The factory paid at least CNY3500 per month as minimum wage. The minimum wages met the local legal requirement.
- The wage was paid on 30th of following month by bank transfer and each worker was given a pay slip and signed for their wages.
- All workers are 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.

Evidence examined:

- Payroll records from Feb 2024 to Dec 2024.
- Local legal minimum wage documents
- Wages and benefits policy
- Labour contracts for all employees (to examine agreed wage rates)
- Leave records and resignation records
- Pay slips of all interviewed workers
- Payment receipts of social insurance
- Workers and management interview

Findings: non-compliances

ZAF600806006

Non-compliance

Due 2023-04-05

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

90 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

The factory did not provide 5 types of social insurance for some workers required by law. Based on to the list of social security contributions provided by the factory for the month of December 2024, the factory has 39 employees, including 3 in the management, of which 36 are workers (including 12 retired workers and 0 new workers), and the factory provided retirement insurance, maternity insurance, medical insurance, unemployment insurance to 2 workers (8.33%), and provided worker's related-injury insurance to 11 workers (45.83%). In addition, the factory provided an employer's liability insurance to 13 workers, valid from Mar 19, 2024 to Mar 18, 2025. 工厂没有按照法规给部分工人缴纳五种社保。根据工厂提供的2024年12月的社保缴费名单，工厂共有39名员工，包括管理层3人，其中工人有36人（包括12名退休工人和0名新员工），工厂给2名工人（8.33%）提供了养老保险、生育保险、医疗保险、失业保险，给11名工人（45.83%）提供了工伤保险。另外，工厂给13名员工提供了一份雇主责任险，有效期从2024年3月19日至2025年3月18日。

Area of non-compliance/non-conformance

Local law

Description (carried over)

The social insurance did not cover all workers. Based on the payment receipt of social insurance (Nov. 2022) review, there were total 38 workers (including 16 retired workers and 0 new worker) in the factory. The factory provided the retirement insurance, unemployment insurance, medical insurance and maternity insurance to 14 workers (63.63%), provided and work-related injury insurance to 22 workers (100%). 工厂社保未覆盖所有员工。根据工厂提供的2022年11月的社保凭证，工厂共有38名工人（包括16名退休工人和0名新员工），工厂给14名员工（63.63%）提供养老、失业、生育、医疗保险，给22名员工缴纳了工伤保险（100%）。

Corrective and preventative actions

The factory should provide the social insurance to all employees. 工厂应给所有员工提供社保

Corrective and preventative actions (carried over)

The factory should provide the social insurance to all employees. 工厂应给所有员工提供社保

Local law reference

Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

Timescales was confirmed by the factory.

Evidence

[insufficient insurance.jpg](#)



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5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages meet a living wage Wages are based on job skills and experience The legal minimum wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	184.0

Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	14.0
	Max hours per month	60.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2260.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	3500.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	19.48
Actual minimum overtime wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	30.17

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 samples from Dec 2024 (Current month); 10 samples from Aug 2024 (Random month); 10 samples from Jun 2024 (Random month).

Are there different legal minimum/ legally recognised CBAs wage grades?

No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?

Above legal minimum

Indicate the breakdown of workforce per earnings

100% workers were paid above the legal minimum.

Are there any bonus schemes used?

No

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Current systems: •The factory reviewed workers' total pay yearly and compared it with a credible 'living wage' to calculate a 'living wage gap'. •The factory used the sixth method of calculating the living wage in the IDH to also evaluate the workers' living wage and improvement plan, which, according to the payroll records provided by the factory, was in line with local standards. •The factory made a wage improvement plan. Evidence examined: •Living wage gap analysis record •Wage improvement plan		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1.The factory has established a system on "Working Hours, Payroll Management Control Procedures" that Outlines the management of this issue on site, including all relevant requirements in the code area, further details can be found in the procedures. However, there is a certain gap between the policies and procedures and the relevant requirements in this area, and the factory has not established an effective system to control workers' overtime hours. 2.The factory appointed Mr. Cai / Deputy director to carry out the relevant procedures, which clearly defined responsibilities and policies, but the management structure was not in line with the relevant requirements of the region, and the responsible department did not effectively control the overtime hours of workers. 3.The factory trained key personnel to implement relevant requirements and communicated them to employees, but the training and communication were not validated to ensure that workers understood their relevant requirements. Systemic problems of workers' overtime and overtime were found in this audit. 4.The factory had established monitoring procedures to monitor risks in terms of working hours, wages, etc., but there was no evidence that the monitoring was effective and led to systemic problems with monthly overtime.

Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC ZAF600806007

Systems and evidence examined to validate this code section

Current systems:

- The factory provided all workers' attendance records from Feb 1, 2024 to the audit date.
- The working time of workers were recorded by face.
- Normally, the factory conducted 8 hours per day and 40 hours per week of work time. All department worker worked in one shift, which was from 07:30-11:00,12:30-16:30.
- The factory did not obtain any Comprehensive Working Hour System Approval.

Evidence examined:

- Factory policy on working hours
- Local and national laws
- Computerized time logging system
- Workers contracts
- Sample pay slips with recorded hours all interviewed workers
- Attendance records showing highest and lowest hours over all employees.
- Quality and production records to cross check working hours
- Interview with workers and management

Findings: non-compliances

ZAF600806007

Non-compliance

Due 2023-04-05

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

90 days

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Description

The monthly overtime of workers exceeded the legal requirements. Based on the attendance records from Feb 2024 to the audit date, it was noted that the attendance findings of 10 sampled workers in Dec 2024 (current month), Aug 2024 (random month) and Apr 2024 (random month) were as follows: 1) 9 (selected from all workshops) sampled workers' monthly overtime hours in Dec 2024 (current month) exceeded legal requirement of 36 hours, which were 54 hours in maximum; 2) 9 (selected from all workshops) sampled workers' monthly overtime hours in Aug 2024 (random month) exceeded legal requirement of 36 hours, which were 60 hours in maximum; 3) 9 (selected from all workshops) sampled workers' monthly overtime hours in Apr 2024 (random month) exceeded legal requirement of 36 hours, which were 50 hours in maximum. 员工的月加班时间超过法规要求。根据工厂提供的从2024年2月至审核当日的考勤记录中分别抽取2024年12月（当前月），2024年8月（随机月）和2024年4月（随机月）的各10名抽样员工的考勤发现：1) 在2024年12月（当前月）9名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为54小时；2) 在2024年8月（随机月）9名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为60小时；3) 在2024年4月（随机月）9名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为50小时。

Description (carried over)

The monthly overtime of workers exceeded the legal requirements. Based on the attendance records from Nov. 1, 2021 to the audit date, it was noted that the attendance findings of 10 sampled workers in Oct. 2022 (current month), Apr. 2022 (random month) and Dec. 2021 (random month) were as follows: 1.(Metal working, spray plastic, assembly and packing)10 sampled workers' monthly overtime hours in Oct. 2022 (current month) exceeded legal requirement of 36 hours which were 52 hours in maximum. 2. (Metal working, spray plastic, assembly and packing)10 sampled workers' monthly overtime hours in Apr. 2022 (random month) exceeded legal requirement of 36 hours which were 52 hours in maximum. 3. (Metal working, spray plastic, assembly and packing)10 sampled workers' monthly overtime hours in Dec. 2021 (random month) exceeded legal requirement of 36 hours which were 52 hours in maximum. 员工的月加班时间超过法规要求。根据工厂提供的从2021年11月1日至审核当日的考勤记录中分别抽取2022年10月（当前月），2022年4月（随机月）和2021年12月（随机月）的各10名抽样员工的考勤发现：1)在2022年10月（当前月）10名抽样员工（金属加工，喷塑，装配和包装）的月加班时间超过法规要求的36小时，最大为52小时；2) 在2022年4月（随机月）10名抽样员工（金属加工，喷塑，装配和包装）的月加班时间超过法规要求的36小时，最大为52小时。3) 在2021年12月（随机月）10名抽样员工（金属加工，喷塑，装配和包装）的月加班时间超过法规要求的36小时，最大为52小时。

Corrective and preventative actions

The factory should ensure the OT hours comply with legal requirement. 工厂应确保工人的加班时间符合法规要求。

Corrective and preventative actions (carried over)

The factory should ensure the OT hours comply with legal requirement. 工厂应确保工人的加班时间符合法规要求。

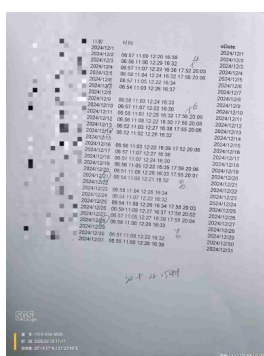
Local law reference

Labor Law of the People's Republic of China (2018 Amendment), Article 41 The employing unit 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.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

Timescales was confirmed by the factory.

Evidence



[OT record.jpg](#)



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6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	Not applicable
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	52.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.The factory has established a system for managing this issue on site outlined in the "Anti-Discrimination Management Procedure", including all relevant requirements in the area of the Code, further details can be found in the procedure. 2.The program file summarizes and processes all code areas Mr. Cai / Deputy director is responsible for executing and understanding his duties. The person Mr. Cai / Deputy director in charge has the status and capacity to oversee the prohibition of any discriminatory behavior in the factory and has a well-established complaint mechanism. 3.The factory communicates the policy and procedure requirements to key personnel and all employees, and has developed effective processes. For example, employees can complain to the company in written or oral form about their discrimination, and the complaint will be investigated by the company's management representative, who will give an oral or written reply to the complainant within 15 days. 4.Monitor the regular collection of employee feedback to the responsible person, which can be understood from the relevant employee feedback records.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current systems:

- According to management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc; female workers and male workers had the same pay and working conditions; promotion was based on workers' ability and skill; training was based on working requirement.
- There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found.
- There was no evidence of sexual harassment.
- The management generally knew the requirement of Non-Discrimination.
- As informed by interviewed workers, most employees spoke highly of the factory management.
- The factory has developed a fair system in all aspects of training, employment, development and promotion to ensure that every employee has a fair opportunity

Evidence examined:

- The hiring and termination procedure, leave application records and employee handbook.
- Payroll records
- Attendance records
- Termination records
- Training records
- Equitable Methodology Procedures Document

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	5%
Three most common nationalities in managerial and supervisory roles	Chinese

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.The factory's "Personnel Recruitment and Employment Procedures" policy Outlines the system for managing this issue on site, including all relevant requirements in the code area, further details can be found in the procedures. 2.The documentation clearly assigns responsibilities, processes, and handles all areas of code - they can be considered robust Mr. Cai / Deputy director is in charge of execution and knows her duties. 3.Principals were trained on regular employed employees and used their knowledge to develop effective processes. Key personnel, such as those in the personnel office, were also trained. 4.Monitor compliance with the process by reporting to the responsible person and develop mechanisms to monitor whether the operator has implemented the process, which can be understood from the relevant training records.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- No agency worker was used by the factory.
- No temporary worker, apprenticeship schemes or home worker was identified.
- The factory has no subcontracted workers.
- All interviewed workers had received a signed labour contract.
- Workers' personal files were provided for review.

Evidence examined:

- The hiring and termination procedure
- Personal files
- Payroll records
- Labour contracts
- Worker and management interview

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
--	--------

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
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Percentage of workers employed as apprentices, trainees or interns	0.0%
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8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. The factory's "Supplier, Subcontractor and Sub-supplier Management Procedures" policy Outlines the system for managing this issue on site, including all relevant requirements in the area of the Code, further details can be found in the procedures. 2. Program files summarize and process all code areas Mr. Cai / Deputy director is in charge of execution and knows his duties. Over time, management structures achieve sustainability compliance. 3. The responsible for the management of suppliers under the guidance of Mr. Cai / Deputy director and takes actions to request and assist suppliers and subcontractors in the social responsibility management of sub-suppliers. Based on the document review, it was found that the factory's Purchasing Department arranges audits of suppliers/subcontractors once a year to assess the suppliers'/subcontractors' social responsibility performance and follow up on improvement measures. 4. By reporting the social responsibility monitoring and evaluation records of suppliers/subcontractors to the responsible person on a regular basis for monitoring, the monitoring situation can be understood from the social responsibility monitoring and evaluation records of relevant suppliers/subcontractors.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

**Systems and evidence examined to
validate this code section**

Current Systems:

- The factory had established social accountability manual including sub-contracting control procedure.
- There was one sub-contractor used by the factory.
- Cross check showed that no home working present in the factory.

Evidence examined:

- Site tour
 - Materials in/out records
 - Interview with management and workers
 - Social accountability manual
-

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
NA-No homemaker used by the factory.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? Yes
One sub-contractor used by the factory.

Are any sub-contractors used? Yes

Sub-contractor 1	Processes subcontracted	Electroplate
	Name of factory	Yuhuan City Electroplate Co Ltd
	Address	Yuhuan Bingang Industrial City
	Dates used	Jan 2024

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. The Factory's "Procedures for the Prohibition of Corporal Punishment and Abuse of Workers" policy Outlines the system for managing this issue on site, including all relevant requirements in the area of the code. Further details can be found in the procedures. 2. Program files summarize and process all code areasMr. Cai / Deputy director is in charge of execution and knows his duties. The factory has developed a complete set of complaint process, the person in charge of each link in the complaint is assumed by the manager of the corresponding department, and the final decision is made by Mr. Cai / Deputy director in the middle of which there is a full collaboration of several departments, which is in line with the continuous development of the management structure. 3 Designate personnel responsible for effectively communicating, implementing and monitoring the prohibition of corporal punishment or abuse of workers. Establish effective management systems, for example, responsible for safeguarding the legitimate rights and interests of employees. Implement measures to prevent all forms of harassment, ill-treatment and corporal punishment; Receive and handle employee complaints of harassment, abuse and corporal punishment, and keep records. 4. Through regular collection of employee feedback from the responsible person and regular training for monitoring, you can understand the monitoring situation from the training records and employee feedback records.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- The factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past.
- There was an internal process for grievance, which was an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.

Evidence examined:

- The relevant policy on prevention of harassment and abuse.
- Internal grievance procedure documentation
- Training records
- Worker and management interview

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?

Yes, there is a formal grievance process
The grievance process is available to all workers
The grievance process is available to members of the local community

What type of grievance mechanism(s) are available?

There were a suggestion box and hotline available.

Number of grievances raised in the last 12 months 0

Number of grievances resolved in the last 12 months 0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1.The factory's "Environmental Policy Procedure" Outlines the system for managing this issue on site, including all relevant requirements in the code area, and further details can be found in the procedure. However, there is no guidance in the procedure document on the factors that have an impact on the environment in the process. 2.Mr. Cai / Deputy director is responsible for implementation, but he does not understand the responsibilities of his position, lacks awareness of the environmental relevance, and over time there will be a management structure that does not achieve sustainability compliance. 3.Establish and develop an effective environmental management system, achieve and regularly review environmental targets and targets, and make them continuously improve. Environmental training for responsible departments and workers to reduce environmental impact, but there is still a lack of comprehensive environmental awareness and inadequate monitoring of the exhaust gases generated and the noise at the factory boundaries. 4.Through regular environmental factor assessment and internal audit monitoring, you can understand the monitoring situation from the environmental factor risk identification records and internal audit documents. The identified environmental factors are evaluated to reduce the impact on the environment as much as possible, but the factory does not implement environmental treatment facilities in a timely manner, e.g., the exhaust gas treatment facility for the blasting process is not set up in accordance with regulatory requirements

Summary of findings

Code area	Workplace requirement	Local law	Finding
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10.A. Environment 2-Pillar	10.A.B Comply with relevant local, regional a...	§1	NC	ZAF600806008
	10.A.B Comply with relevant local, regional a...	§2	NC	ZAF600820285
	10.A.B Comply with relevant local, regional a...	§3	NC	ZAF600820286

Systems and evidence examined to validate this code section

Current systems:

- The factory learned about the environment impact of their site and took continuously management measures to control the environment impact.
- Based on document review and confirmed with factory management, the factory obtained EIA report, EIA approval, and acceptance approval of environmental facility and Fixed source registration.
- Based on workers interview, they were trained on environmental protection.
- Based on document review, the factory collected related environmental regulations.
- The factory had procedure on environment protection and Mr. Gu / General manager was appointed as response for environment performance.

Evidence examined:

- Environmental policy and procedure
- Legally required environmental documents were provided for review
- Worker and management interview
- Site tour
- EIA report and EIA approval

Findings: non-compliances

ZAF600806008	Non-compliance	Due 2024-04-02
Code area 10.A Environment 2-Pillar	Status Open*	
Workplace requirement 10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.	Time given to resolve 60 days	
Issue title 640 - No required air emission treatment in place contrary to law	Verification method Desktop audit	
Description According to the requirements of the environmental impact assessment approval, the factory should install a collection and emission system for the waste gas generated from the polishing and sanding processes to ensure that it is discharged through a 15 meter high exhaust stack. Based on on-site observation, it was found that the factory did not install waste gas treatment equipment for the above processes. 根据环评批复要求，工厂应对抛光、抛砂工序产生的废气安装收集排放系统以确保通过15米高排气筒排放，根据现场审核发现，工厂未对以上工序安装废气处理设备。	Area of non-compliance/non-conformance Local law	
Description (carried over) According to the requirements of the environmental impact assessment approval, the factory should install a collection and emission system for the waste gas generated from the polishing and sanding processes to ensure that it is discharged through a 15 meter high exhaust stack. Based on on-site observation, it was found that the factory did not install waste gas treatment equipment for the above processes. 根据环评批复要求，工厂应对抛光、抛砂工序产生的废气安装收集排放系统以确保通过15米高排气筒排放，根据现场审核发现，工厂未对以上工序安装废气处理设备。		
Corrective and preventative actions The factory should treat waste gas in accordance with environmental impact assessment requirements.工厂应按照环评要求处理废气。		
Corrective and preventative actions (carried over) The factory should treat waste gas in accordance with environmental impact assessment requirements.工厂应按照环评要求处理废气。		
Local law reference Atmospheric Pollution Prevention and Control Law of the People's Republic of China (2018 Amendment), Article 7 Enterprises, public institutions, and other business entities shall take effective measures to prevent or reduce atmospheric pollution and shall assume legal responsibility for the damage they have caused. ... Article 20 Enterprises, public institutions, and other business entities discharging pollutants to the atmosphere shall set atmospheric pollutant discharge outlets according to the laws, regulations, and the provisions of the competent department of ecology and environment under the State Council. It is prohibited to discharge atmospheric pollutants by means of evading supervision such as secretly discharging pollutants, altering or forging monitoring data, suspending production for the purpose of evading on-site inspection, opening emergency discharge channels under non-emergent situations, or operating atmospheric pollution prevention and control facilities in an abnormal manner.		

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ZAF600820285

Non-compliance

Due 2025-03-27

Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

30 days

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Verification method

Desktop audit

Description

Based on the on-site observation and document review, it was found that the factory did not conduct noise testing in the workshop for the cutting, spraying plastic, metal working and assembly workshops. 根据现场审核及文件审核发现，工厂未对车间内下料、喷塑、金加工及组装车间的进行噪音检测。

Area of non-compliance/non-conformance

Local law
Base code

Corrective and preventative actions

The factory should be tested for factors that have an impact on the environment. 工厂应对存在环境影响的因素进行检测。

Local law reference

Law of the People's Republic of China on Noise Pollution Prevention and Control (2021 Amendment), Article 38

Units that implement pollutant discharge permit management shall, in accordance with regulations, conduct self-monitoring of industrial noise, keep original monitoring records, disclose monitoring results to the public, and be responsible for the authenticity and accuracy of monitoring data.

Key noise pollutant discharge units shall, in accordance with state regulations, install, use, and maintain automatic noise monitoring equipment, and network with the monitoring equipment of the ecological environment authority.

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ZAF600820286

Non-compliance

Due 2025-04-26

Code area

10.A Environment 2-Pillar

Status

Open*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Issue title

637 - No monitoring of air emission limits as per legal requirements

Description

Based on the on-site observation and document review, it was found that the factory did not test the generation of waste gas generated in the plastic spraying and sand processes in the workshop. 根据现场审核及文件审核发现，工厂未对车间内喷塑、抛砂工序中产生的废气产生进行检测。

Corrective and preventative actions

The factory should be tested for factors that have an impact on the environment. 工厂应对环境有影响的因素进行检测。

Local law reference

Atmospheric Pollution Prevention and Control Law of the People's Republic of China (2018 Amendment), Article 18
When building projects that have an impact on atmospheric environment, enterprises, public institutions, and other business entities shall conduct environmental impact assessments and publish the environmental impact assessment documents according to the law; when discharging pollutants to the atmosphere, they shall conform to the atmospheric pollutant discharge standards and abide by the total quantity control requirements for the discharge of key atmospheric pollutants.

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law
Base code

* PDF generated at 11:03 (UTC) on 25 Feb 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No. The site does not have relevant environmental or energy management certificate.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	Yes Yes. The factory has implemented measures against climate change.

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Current systems: • The factory learned about the environment impact of their site and took continuously management measures to control the environment impact. • Based on document review and confirmed with factory management, the factory obtained EIA report, EIA approval, and acceptance approval of environmental facility and Fixed source registration. • Based on workers interview, they were trained on environmental protection. • Based on document review, the factory collected related environmental regulations. • The factory had procedure on environment protection and Mr. Gu / General manager was appointed as response for environment performance. Evidence examined: • Environmental policy and procedure • Legally required environmental documents were provided for review • Worker and management interview • Site tour • EIA report and EIA approval		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Packaging optimization Responsible use and management of water Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The factory has established an environmental management system and collected the relevant regulations of the country of sale to meet the environmental and chemical requirements of the country of sale.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The factory checks that the business partners operating on the site hold the appropriate permits and licenses and conduct their business in accordance with the environmental requirements of the facility.

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	369,723.5	443,668.7
Total electricity consumption from renewable sources (kWh)	Data not available	Data not available
Sources of renewable energy used	Data not available	Data not available
Types of renewable energy used	Data not available	Data not available

Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	476	523
Water discharged	Municipal sewer network	Municipal sewer network
Water volume discharged (m3)	456	500
Water volume recycled (m3)	Data not available	Data not available
Total waste produced (mt)	41	40
Total hazardous waste produced (mt)	0.1	0.1
Waste to recycling (mt)	30	30
Waste to landfill (mt)	Data not available	Data not available
Waste to other (mt)	10.9	9.9
Total product produced (mt)	1,440	1,500

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. The factory's "Business Ethics Control Procedure" Outlines the system for managing this issue on site, including all relevant requirements in the area of the code, further details can be found in the procedure. 2. Program files summarize and process all code areas Mr. Cai / Deputy director is in charge of execution and knows his duties. Over time, management structures achieve sustainability compliance. The responsible departments strictly enforce the policy and understand the importance of business ethics. 3. Establish and develop an effective business ethics control system. Annual training was conducted for employees in key positions, and the training effect was effectively verified. 4. Monitoring the effective implementation, the responsible department regularly evaluates key positions and related suppliers to ensure the effective implementation of the policy.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current systems:

- There was a senior management personnel (Mr. Cai / Deputy director) designated to responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
- The company established a business ethics policy, which met national regulations / law concerning the relative standards.
- The business ethics policy was communicated to workers through posters and training.
- The site had received the Business Ethics policy of the auditor/audit company.
- There was an internal grievance process, and there was a suggestion box sited in the workshop.
- The factory also communicated the company's business ethics policies to stakeholders. The factory has appointed one administrator to receive complaints and suggestions from stakeholders through direct telephone, exclusive email, or letter.
- The factory was not subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations.

Evidence examined:

- Management and worker interview
- The company business ethics policy
- Relevant Position description
- Training records
- Employee handbook
- Supplier list
- Complaint/appeal/grievance record
- Management and worker interview

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	There is no such certification in place.

Attachments



[SMETA-JSASCN25276920-YUHUAN TAIZE PLUMBING FITTINGS CO LTD-Annual-Feb 17-18,2025-Oniste CARP.pdf](#)



[SMETA-JSASCN25276920-YUHUAN TAIZE PLUMBING FITTINGS CO LTD-Annual-Feb 17-18,2025-Photo Report.pdf](#)





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