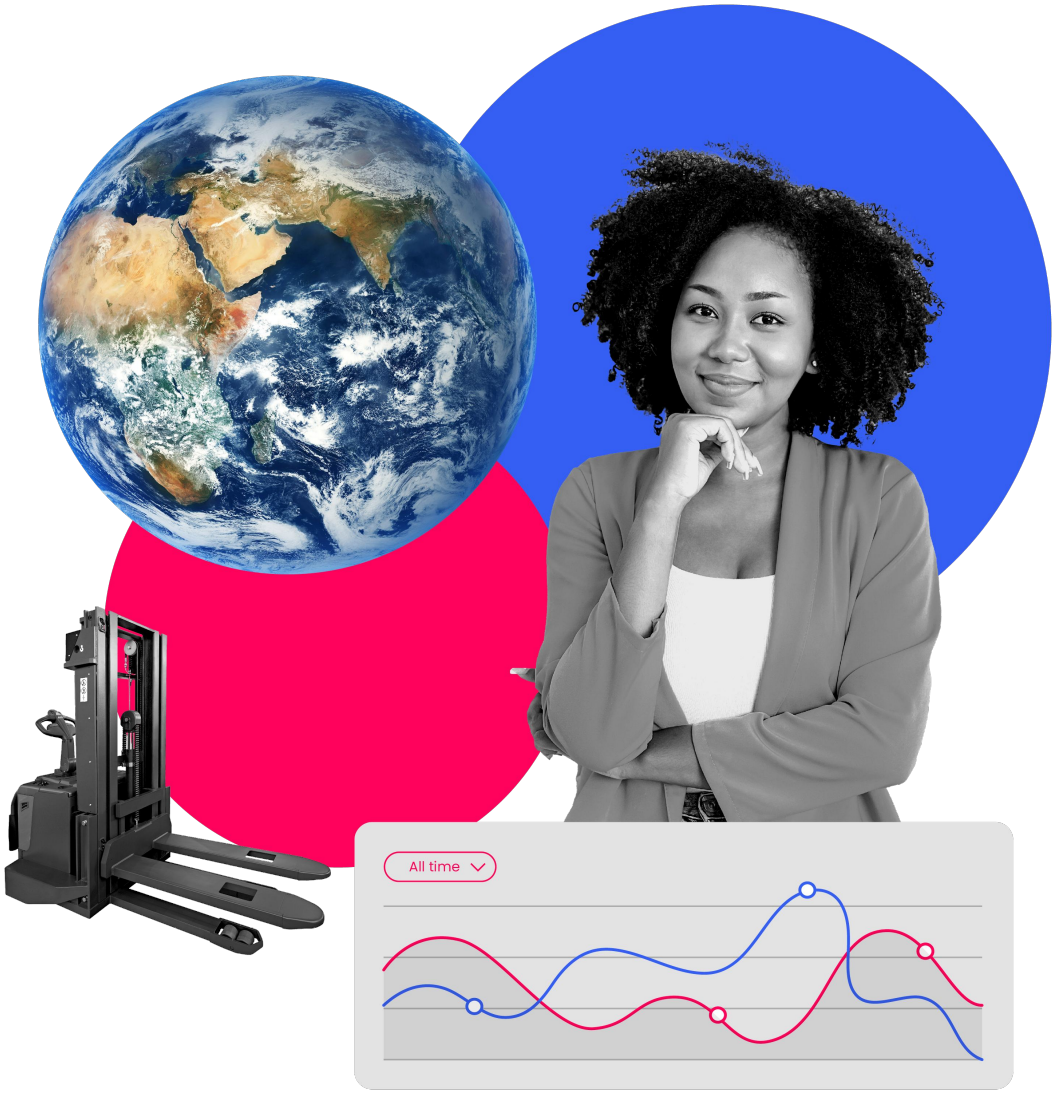
SMETA®
Sedex Members Ethical Trade Audit

Sedex Members Ethical Trade Audit Report

Version 7



Contents

Audit content

Audit and site details

Audit parameters

Audit attendance

SMETA declaration

Summary of findings

Management systems

Site details and data points

- Site details
- Worker analysis
- Worker interviews
- Measure workplace impact
- 0. Enabling accurate assessment
- 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
- 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

10.A. Environment 2-Pillar

Attachments

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	ZC5000048933	**Auditor company name**	TUV Rheinland (TUEV Rheinland)
Date of audit	2024-12-24	**Audit conducted by**	Sedex member
Audit pillars	Labour Standards | Health and safety		

Site details

Sedex site reference	ZS1000057649	**Site name**	ShenZhen Pro-Vision Optical
Business name	ShenZhen Pro-Vision Optical	**Site address**	518115 101,No.48,Xintang Road, Dakang Community,Yuanshan Street, Longgang District,Shenzhen, CN
Site phone	+8613927478509	**Site email**	alea.w@pro-vision-opt.com

Audit parameters

Time in and out	Day 1	
	In	08:30
	Out	16:30
Audit type	Full initial	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	No	
Who signed and agreed CAPR?	Mr. Wu / General manager	
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 facility.		
Reason for absence during the audit	There was no Union in the facility.		
Reason for absence at the closing meeting	There was no Union in the facility.		

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)	Nil		
Lead auditor	Joe Fang	**APSCA Number**	21703717
Additional auditor			
Date of declaration	2024-12-24		

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	Mr. Wu
Title	General manager
Date of declaration	2024-12-24

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 ZAF600757788
	3.A Ensure a safe working environment. Put in...	§2	NC ZAF600757789
	3.H Where identified as necessary to reduce r...	§3	NC ZAF600757790
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§4	NC ZAF600757791
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§5	NC ZAF600757792

Local law issues

§1	The Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.
§2	The PRC Law of Prevention and Control of Occupational Diseases article 35, the employer shall conduct regular occupational health examination for those laborers who are engaged in using or contacting noxious articles in their working process as required by medical administrative department under the State Council. The occupational health examination should be conducted before laborers start to take work post, in the course of the work post and after leave the work post and employer should inform the laborers of the result of the occupational health examinations. The expense of the occupational health examination should be borne by employers.Employer should not arrange laborers without the occupational health examination to be engaged in the work with using or contacting noxious articles, or laborers with any occupational prohibitions to be engaged in the prohibited work from them. Once the occupational health examination indicates that employee is suffering from the occupational disease in relation to his or her occupation, the employer shall transfer such a laborer out of his or her original work post, and allocate him or her in a proper way. Employer should not rescind or terminate the contracts signed with those employees without the occupational health examination at time of leaving the work post. The occupational health examination should be conducted by the medical organizations authorized by the medical administrative department above province-level.
§3	Law of the PRC on Work Safety article 45, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.
§4	The PRC Labor Law article 72, employing unit and employees must participate in social insurance and pay social insurance premiums the law; and according to Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic retirement insurance, and the basic retirement insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic illness or injury insurance for employees, and the basic illness or injury insurance premiums shall be jointly paid by employers and employees the relevant provisions of the state. Article 33 Employees shall participate in the disability caused by work-related injury or occupational disease insurance, and the disability caused by work-related injury or occupational disease insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees the relevant provisions of the state. Article 53 Employees shall participate in child-bearing insurance, and the child-bearing insurance premiums shall be paid by employers rather than employees the relevant provisions of the state.
§5	Labor Law of the People's Republic of China, 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 month shall not exceed thirty-six hours.

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	✓	ⓘ	ⓘ	ⓘ

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000048933	
Sedex site reference	ZS1000057649	
Company name	ShenZhen Pro-Vision Optical	
Business ownership type	GOODS	
Site name	ShenZhen Pro-Vision Optical	
Site name in local language	深圳市精源兴光学科技有限公司	
GPS location	**GPS address**	101,No.48,Xintang Road,, Dakang Community,Yuanshan Street 深圳市龙岗区园山街道大康社区莘塘路48号101
	Coordinates	Latitude: N 22°38'42"/ Longitude: E 114°13'10"
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Mr. Wu
	Job title	General manager
	Phone number	+8613927478509
	Email	alea.w@pro-vision-opt.com
Applicable business and other legally required business license numbers and documents	Business license number: 91440300MADKRRHY6B Period of validity: long-term effective from May 06, 2024.	

Site activities

Site function	Factory Processing/Manufacturer

Site activities

Site activities	**Primary**	Manufacture of optical instruments and photographic equipment
	Secondary	
	Other	
Product type	Glasses and eyeglass accessories.	
Process overview	The main products: glasses and eyeglass accessories. /The main production processes: Routing cutting, CNC machining, Welding, Bending, Temple shooting, Polishing, Tumbling, Hinge fixing, Cleaning, Assembly and Packaging./There were 5 welding machines, 16 titanium welding machines, 13 routing cutting machines, 11 CNC machines, and 16 barrel rolling machines etc in the facility.	
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	1200m^2	
Building 1	**Last construction works on site**	2004
	If building is shared, provide details	The building was not shared with another facility/company.
	Number of floors	4
	Description of floor activities	1/F: Routing cutting, Welding, CNC workshops, raw material and office. 2/F: Polishing, Assembly, Packaging workshops and finished goods area. 3/F: Nail glue, Rolling drum workshops and office. 4/F: CNC, Bending workshops and office.
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	

Site scope

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 provided The facility did not provide transport for workers.

Work patterns

Approximate workers on site per month (% of peak)	**January**	0-25%	**February**	0-25%
	March	0-25%	**April**	0-25%
	May	25-50%	**June**	25-50%
	July	25-50%	**August**	25-50%
	September	25-50%	**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 The facility did not assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.

Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No The facility did not conduct HRIA.

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	29 *(69%)*	13 *(31%)*	- -	42 *(100%)*

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	29 *(69%)*	13 *(31%)*	- -	42 *(100%)*
Temporary or fixed term employees	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Agency or subcontracted workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Seasonal workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Self-employed workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Informal workers including home workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Apprentices, trainees or interns	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	21 *(50%)*	9 *(21.4%)*	- -	30 *(71.4%)*
International migrant workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Total migrant workers	21 *(50%)*	9 *(21.4%)*	- -	30 *(71.4%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	All workers are Chinese. The domestic migrant workers came from Guangxi, Hunan, Hubei Province.

Workers by age

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

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	No obvious peak season in the past month. (the facility established on May 06, 2024)
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	69%	31%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Workers paid hourly / daily rate	29 *(69%)*	13 *(31%)*	- -	42 *(100%)*
Salaried workers	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Paid weekly	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*
Paid monthly	29 *(69%)*	13 *(31%)*	- -	42 *(100%)*
Other	0 *(0%)*	0 *(0%)*	- -	0 *(0%)*

* % of total workforce

If other payment cycle entered, please provide details	N/A. The workers were paid monthly wages.

People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 *(2.4%)*	0 *(0%)*	- -	1
Supervisors or team leaders	1 *(2.4%)*	2 *(4.8%)*	- -	3
Administrative staff	0 *(0%)*	1 *(2.4%)*	- -	1

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	10 sampled workers were selected for worker interview: 5 individual workers + 1 group of 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) All workers interviewed had a positive attitude to the management and the site.
What did the workers like the most about working at this site?	Pay Hours worked, rest days or breaks Freedom of movement Equal opportunities Overtime
Additional comments	No additional comment.
Attitude of workers' committee/union representatives	The interviewed worker representative showed that the management was cooperative with workers and the workplace was generally acceptable. She was satisfied with the attitude of management and no negative evidence was observed.
Attitude of managers	The facility management was positive towards auditor, they provided relevant documents to auditor for review, showed auditor the production process during facility tour, and provided auditor an independent room for workers interview. At the closing meeting, auditor provided the facility representative a general overview, and explained all findings to them. In the meantime, the auditor made corrective suggestions corresponding to findings of the facility representatives, facility representative signed the CAPR.

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
Total number of workers interviewed	10

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	4	1	-	5
Workers interviewed individually	3	2	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	5	4	-	9
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	5	4	-	9

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	3.0%	-	4.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* 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)	0.0%	1.0%	-	1.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* 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 accident records were provided to review. No accident happened in the past months. As per the policy, if the accidents happen, management will keep records of all accidents.

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

	Men	Women	Other	Total

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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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: 1. The site has a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter. 2. The site published a human rights statement and posted in public. 3. Mr. Wu/General manager was responsible for implementing standards concerning Human Rights. 4. There was formal training given to all employees and their suppliers on the need to protect human rights. Evidence examined: 1. Employee handbook with ETI Code, written policies and procedure. 2. Social responsibility management manual contained details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client requirement and local law. 3. Management interview 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?	No

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	Some Improvements Recommended
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. Policies and Procedures: R There was an internal ETI policy in place that addresses freely chosen employment. And the relevant procedure has been implemented to ensure compliance with this policy and procedure. The policies and procedures were reviewed and updated regularly. 2. Resources: SIR There was a reponsible person available for ensuring implementation of site policies, however, no regular training was available to ensure the management meet the requirement. 3. Communication and Training: SIR Knowledge of free employment were communicated and included in the annual training, the relevant employees training conducted, the effectiveness of the training was not assessed as worker interview. 4. Monitoring: R The effectiveness of free employment procedures, were monitored through regular meetings between the worker representatives and management, documented evidence such as training records, meeting minutes were kept, the policy could be met.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: 1.The site had policies and processes which prohibited force labour and prison labour was available for review. 2.The hiring procedures stated that the ID cards should be presented upon hiring but only the copies of identification card will be kept in the personal files. The original one would be returned to workers. As per the interview, most of them get the hiring information from posters or internet. No deposit was collected by the facility. 3.The facility policy also stated that it was free for them resigned from the site with one month's prior written applications. The statutory holidays, benefits, wages, working hours were also included in the facility regulations. 4.The procedures also stated that the employees were free to have water break and rest during the work. They can refuse to conduct overtime work by notification in advance. All above were also confirmed in management and interview. Evidence examined: 1.Hiring procedures from Rules and Regulations of the facility. 2.HR employment system. 3.Employee manual. 4.Payrolls. 5.Personal data files (to check for if original documentation was held by facility). 6.Resignation documents of resigned employee. 7.Management and workers' interview.

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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Policies and Procedures: R The factory established policies and procedures regarding responsible recruitment and entitlement to work, keeping up-to-date with local and national laws and training projects, etc. The policies and procedures were reviewed and updated regularly. 2.Resources: R The HR manager was responsible for communicating, implementing and checking compliance against code requirements. The responsible employees understood their role and responsibilities and the role requires the necessary skills to implement them. 3.Communication and Training: SIR There was a well-established training programmer in place regarding the policies and procedures. No assessment of effectiveness for the training. 4.Monitoring: R The effectiveness of free employment procedures, were monitored through regular meetings between the worker representatives and management, documented evidence such as training records, meeting minutes were kept, the policy could be met.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: 1. The site has a recruitment management system, and the process document describes that workers did not need to pay any fees or collateral during recruitment and employment, including deposits, medical examination fees, ID cards, etc. Additionally, it also requires that the agency that they cooperated shall not demand payment of any fees from workers during employment for various reasons. 2.Per management and worker interview, the employees did not to pay any fees including deposits, medical examination fees etc. 3. All employees had the proper legal rights to work in this region. 4. All employees were recruited directly by the facility and no agency was involved in facility's recruitment processes. 5. No agency staff or foreign employees were used by the facility. 6. All recruitment fees were paid by the facility, such as referral fees, medical examination fees, work permits, etc If the facility found the workers have paid recruitment fees, they should promptly return the fees to workers after confirmation. Evidence examined: 1. Hiring procedure. 2. Employees handbook. 3. Personal files and contracts. 4. Interview with management and workers.

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	71%
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	The domestic migrant workers came from Guangxi, Hunan, Hubei Province.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	No The workers did not pay any costs during recruitment and employment process as interview and document review.
Were recruitment fees or costs identified during worker interviews?	No Through worker and management interview, it was noted that no recruitment fees or costs are needed to be paid by workers.All recruitment fees or costs were paid by facility.

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	Some Improvements Recommended
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. Policies and Procedures: R The facility established procedures regarding ""Freedom of association and right to collective bargaining", the policy reviewed annually, updated yearly this year. 2. Resources: SIR The admin supervisor was responsible for ensuring compliance with the policy. And the specific role identified as responsible was documented. But the admin manager did not know her role as management interview. 3.Communication and Training: SIR Training and communication regarding the policies have been conducted by employees. The relevant records were provided for review. Partial workers did not know the worker representatives for worker interview. 4.Monitoring: R Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: 1. The site has a freedom of association and right to collective bargaining policies and processes: the workers have right to organize their trade unions and negotiate with management. The site recognizes the union and supports its establishment and implementation. 2. The facility management always respected workers' choice and the freedom of association and never interfered with workers to join the trade union or any other kind of workers committee. 3. There was no union but worker representatives in the facility. 4. There were 2 worker representatives who were democratically elected by the production workers. The worker representative normally would have a meeting on a trimonthly basis to summarize the concerns and complaints from production workers. 5. All interviewed workers stated that they could report their concerns to the worker representative or directly to the supervisor or upper management. 6. In addition, workers could also respond their concerns through suggestion boxes. And all complaints or suggestions would be tackled within a short time. 7. Per worker representative' interview, he said that he could collect workers' opinions through holding meetings without interference. Evidence examined: 1. The policy on freedom of association and right to collective bargaining. 2. The social accountability manual included worker committee selection program and the responsibility of the worker representative. 3. Interview with workers. 4. Interview with management.

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?	Yes
Does the membership reflect the nationality composition of the workforce?	Yes
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	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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1.Policies and Procedures: R The facility established procedures regarding """"Working conditions are safe and hygienic", the policy reviewed annually, updated early this year. 2.Resources: R The admin supervisor was responsible for communicating, implementing and checking compliance against code requirements, undertook the training regularly, learned the relevant laws and regulations to ensure that the factory's policy is implemented on a long-term basis. 3.Communication and Training: FIR Workers received relevant training, such as PPEs training, machine operation training, emergency training, etc. However, communications and/or training was not effective i.e., partial workers did not use PPE at work, partial chemicals without safety warning signs in the facility. 4.Monitoring: FIR Risk assessment, tour check, root analysis, correct action and prevention, internal audit and management review were conducted regularly. Overall performance was monitored by the Admin Manager and EHS team. However, failure in monitoring has or is likely to lead to systemic major appearing. For the glasses factory, normally, there was a risk of health and safety, such as no PPE use, no safety warning signs on chemicals.

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	ZAF600757788
	3.A Ensure a safe working environment. Put in...	§2	NC	ZAF600757789
	3.H Where identified as necessary to reduce r...	§3	NC	ZAF600757790

Systems and evidence examined to validate this code section

Current Systems:
The site has a health and safety management system including policies, processes, EHS committee, training and inspection records, corrective action and prevention, etc.
1. General Health and Safety management
- Health & Safety policy was established in the facility and the facility manager was familiar with it.
- Mr. Wu/general manager was responsible for the facility's safety and health conditions.
- Purified water was provided free of charge to workers.
- Lavatory facilities were accessible and adequate in number, segregated for men and women.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings showed that there were trimonthly meetings between the H&S committee (workers) and the H&S manager, and each point was acted on.
2. Fire Safety
-There were 2 exits from each work area and these were clearly marked.
- Fire fighting equipment was adequate and checks were up-to-date.
- Evacuation diagrams were posted in all areas and understood by all workers interviewed.
-Fire drills were organised and recorded every 6 months for production unit. The last fire drill was conducted on November 28, 2024
- Training has been given to all employees.
3. Electrical safety
-The electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse board.
4. Medical services
-There were adequate first aid kits in each production area and they were well stocked.
- There were 3 trained first aiders on site.

Evidence examined:
1. Health and safety policy.
2. Health and safety manual.
3. Health and safety committee minutes.
4. Training records and certificates.
5. Special equipment inspection report.
6. Fire equipment maintenance records.
7. Fire drill and evacuation records.
8. Building structure safety certificate.
9. Fire safety certificate.
10. First aider certificates.
11. Checks on fire equipment.
12. Accident reports.
13. Electrician certificate.
14. Interview with H&S manager and committee members.

Findings: non-compliances

ZAF600757788 Non-compliance Due 2025-02-01

Code area
3 Working conditions are safe and hygienic

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.

Issue title
233 - Hazardous substances (e.g. chemicals and pesticides) are stored unlabelled or labelling is incorrect

Description
No safety label for hazardous chemicals.
During audit, 3 out of 6 bottle chemicals in the packing workshop were found no safety warning labels. such as glue
危险化学品无安全标签。
审核中发现包装车间上的6瓶化学品中有3瓶没有发现安全警告标签， 例如胶水。

Corrective and preventative actions
It is recommended that the safety warning labels should be attached for all chemicals used for identification.
建议企业应对所有使用的化学品进行安全警告标识。

Local law reference
The Regulations on the Safe Use of Chemicals in Workplace, Article 12 The unit, which uses chemical, shall set up identification label for all chemicals in using. For dangerous chemical, a safety label shall be applied and MSDS be provided for worker.

Evidence



NC-No safety warning signs on chemicals.jpg

Status
Open*

Time given to resolve
30 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Local law
Base code

* PDF generated at 17:15 (UTC) on 02 Jan 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600757789 Non-compliance Due 2025-02-01

Code area
3 Working conditions are safe and hygienic

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.

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)

Description
No occupational health examination for eligible workers.
Through onsite observation, document review and management interview, it was noted that the facility did not provide pre-job occupational health examination to the employees who contacted with hazardous chemicals, dust and noise. E.g polishing workers, rolling drum workers etc.
Note: The facility established on May 06, 2024 and started to production since May 07, 2024.
没有为符合条件的工人提供职业健康检查。 通过现场观察、文件审查和管理层访谈，发现企业未对接触危险化学品、粉尘和噪声的员工进行上岗前的职业健康检查。例如打磨工人、滚桶工人等。备注：该工厂成立于2024年5月06日，自2024年05月07日开始生产。

Corrective and preventative actions
It is recommended that the facility shall conduct pre-job, in-job and post-job occupational health examination for those laborers who are engaged in using or contacting hazardous chemicals, dust and noise.
建议企业应提供岗前, 岗中和岗后的职业健康检查给使用或接触职业危害工序的员工。

Local law reference
The PRC Law of Prevention and Control of Occupational Diseases article 35, the employer shall conduct regular occupational health examination for those laborers who are engaged in using or contacting noxious articles in their working process as required by medical administrative department under the State Council. The occupational health examination should be conducted before laborers start to take work post, in the course of the work post and after leave the work post and employer should inform the laborers of the result of the occupational health examinations. The expense of the occupational health examination should be borne by employers.Employer should not arrange laborers without the occupational health examination to be engaged in the work with using or contacting noxious articles, or laborers with any occupational prohibitions to be engaged in the prohibited work from them. Once the occupational health examination indicates that employee is suffering from the occupational disease in relation to his or her occupation, the employer shall transfer such a laborer out of his or her original work post, and allocate him or her in a proper way. Employer should not rescind or terminate the contracts signed with those employees without the occupational health examination at time of leaving the work post. The occupational health examination should be conducted by the medical organizations authorized by the medical administrative department above province-level.

Evidence

Status
Open*

Time given to resolve
30 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Local law
Base code



No occupational health examination for eligible workers..jpg

* PDF generated at 17:15 (UTC) on 02 Jan 2025. View this finding on the Sedex platform for live updates and closure details.

ZAF600757790

Non-compliance

Due 2025-02-01

Code area
3 Working conditions are safe and hygienic

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).

Issue title
278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate

Description
The facility provided activated carbon masks/goggle/dust mask/ear-plugs for workers who contact to hazardous chemicals/dust/noise, and requested them to wear at work. However, during audit, it was noted that below:
1)2 out of 4 polishing workers who contact to dust/noise did not wear goggle/dust masks/ear-plugs at work.
2)2 out of 3 Routing workers who contract to metal dust did not wear dust masks at work.
该企业为接触危险化学品/粉尘/噪音的工人提供活性炭口罩/护目镜/防尘口罩/耳塞，并要求他们在工作中佩戴。然而，审核中发现到以下情况：
1）4名接触粉尘/噪音的打磨工人中有2名工人在工作中没有戴护目镜/防尘口罩/耳塞。
2） 3名接触金属粉尘的锣切工序工人中有2人在工作中没有戴防尘口罩。

Corrective and preventative actions
It is recommended that the facility should ensure the facility provided proper personal protective equipment for workers who contact with hazardous factors, including hazardous chemicals, noise or dust etc. And ensure them to wear at work.
建议企业应确保为接触职业危害因素(危险化学品，噪音，粉尘等）的工人提供适当的个人防护装备, 并且确保他们在工作中佩戴。

Local law reference
Law of the PRC on Work Safety article 45, manufacturing units shall provide personal protective equipment to employees. Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.

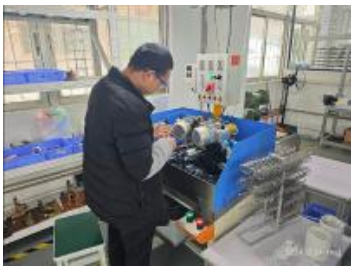
Evidence

Status
Open*

Time given to resolve
30 days

Verification method
Desktop audit

Area of non-compliance/non-conformance
Local law
Base code



NC-The Routing worker did not wear masks at work.jpg



NC-The polishing workers did not wear PPEs at work.jpg

* PDF generated at 17:15 (UTC) on 02 Jan 2025. View this finding on the Sedex platform for live updates and closure details.

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 Yes, qualified safety officer
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)?	Yes There were hazardous chemicals used in the facility, such as printing ink, thinner, glue etc.
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable 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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: R The site had a detailed Anti-using child labor management policy and procedure. And the relevant procedure has been implemented to ensure compliance with this policy. The policies and procedures were reviewed and updated regularly. 2.Resources: R Documentation clearly assigns responsibilities, processes, and addresses all code areas. The HR was responsible for implementation and aware of their responsibilities. Continuous training was conducted every year, and learned the relevant laws and regulations. 3.Communication and Training: SIR Training was conducted including all key persons according to the documented procedure, which as well as assessment and refresher training. No assessment of effectiveness for the training. 4.Monitoring: SIR Anti-using child labor management breaches were effectively monitored, however, overall performance was not reported to the relevant senior management.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: 1.The complete hiring procedure was established in the site, which requires that the minors under 16 years old were not allowed to join the facility. 2.The facility would verify all employees' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files. The system was effectively implemented. 3.The child labour remediation policy was established in the facility. 4.There was no student or apprentice at the facility. Evidence examined: 1. The recruitment policy on child labour. 2. Recruitment procedure. 3. Latest employee list. 4. Personnel files of all workers. 5. Interview with management and workers. 6. Site tour.

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	28
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	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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1.Policies and Procedures: R There was an internal policy and procedure policy in place that addresses legal wages paid. And the procedure has been implemented to ensure compliance with this policy. The policies and procedures were reviewed and updated regularly. 2.Resources: R The admin supervisor was responsible for ensuring compliance with the policy. Continuous training for relevant employees every year, and learned the relevant laws and regulations. 3.Communication and Training: FIR Training was conducted according to the documented procedure, which included assessment and refresher training. Communications and/or training is not effective i.e., partial employees did not understand the benefits of obtaining social insurance, so they did not participate in social insurance. 4.Monitoring: FIR There was no monitoring of the effectiveness of procedures to meet policy. And some employees did not participate in social insurance due to lack of awareness. For the glasses factory, normally, there was a risk of social insurance coverage rate and not all employees were provided with 5 types of social insurance.

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 ZAF600757791

Systems and evidence examined to validate this code section	Current Systems: 1.The site has a remuneration management system to manage the wage, overtime rate and benefits etc. The facility established on May 06, 2024 and started to production since May 07, 2024. 2.During audit, the payroll records from May 2024 to November 2024 and attendance records from May 07, 2024 to December 24, 2024 (audit day) were provided for review. As per review of sampled employees' payrolls and attendance records from September 2024, October 2024 and November 2024 (current month), it was noted that all workers were paid at least RMB2,360 per month (i.e RMB13.56 per hour) which met the legal minimum wage as RMB2,360 per month. 3.All employees' wages were calculated by hourly rate basis by cash on or before 7th of each month for previous month. The pay slip with proper information including workers name, department, wage level, regular working hours, regular work payment, overtime hours, overtime payment, gross wages, deductions, net wages, staff signature etc. was provided to each worker. 4.Additionally, all sampled workers were properly paid 150% and 200% of their normal wages for all workdays and weekend overtime hours respectively as legally required and no statutory holidays overtime hours were noted. All workers were paid when they were enjoying statutory holidays. 5.Annual leave benefit was also entitled to the employees who worked more than one year in the facility according to legal law. 6.Unreasonable deduction was not allowed. During audit, no unreasonable deduction was found. 7.Insufficient social insurance participated. Evidence examined: 1. Wages and benefits policy and procedure. 2. Local and national laws. 3. Local legal min wage documents. 4. Overtime premiums records. 5. Labour contracts for all workers. 6. Resignation records. 7. Production records. 8. Social security insurance payment receipts. 9. Worker interview and management interview.

Findings: non-compliances

ZAF600757791

Non-compliance

Due 2025-03-03

Code area
5 Legal wages are paid

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

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

Description
Per document review and management interview, there were 47 employees including 2 retired employees and no new employee in the facility during audit. However, it was noted that not all employees had participated in all 5 types of social insurance in the past months. And details in December 2024 as below:
1)7 out of 45 eligible employees (15.6%) had participated in basic retirement insurance, unemployment insurance, maternity insurance and medical insurance.
2)8 out of 45 eligible employees (17.8%) had participated in work-related injury insurance.
Remark: The facility established on May 06, 2024 and started to production since May 07, 2024.
Per management confirmation, the facility did not purchase commercial injury insurance for employees.
根据文件审查和管理层访谈，审计期间该设施有47名员工，其中包括2名退休员工，没有新员工。在过去几个月里，并非所有员工都参加了所有5种社会保险。2024年12月的详细信息如下：
1） 45名符合条件的员工中有7名（15.6%）参加了基本养老保险、失业保险、生育保险和医疗保险。
2） 45名符合条件的员工中有8名（17.8%）参加了工伤保险。
备注：该工厂成立于2024年5月06日，自2024年05月07日开始生产。根据管理层确认，企业未为员工购买商业伤害保险。

Corrective and preventative actions
It is recommended that the facility shall ensure all employees participate in the all 5 types of social insurance schemes and therefore receive all of their statutory welfare to comply with the Law. 建议企业应保证所有员工均参加全部五种社会保险。

Local law reference
The PRC Labor Law article 72, employing unit and employees must participate in social insurance and pay social insurance premiums the law; and according to Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic retirement insurance, and the basic retirement insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic illness or injury insurance for employees, and the basic illness or injury insurance premiums shall be jointly paid by employers and employees the relevant provisions of the state. Article 33 Employees shall participate in the disability caused by work-related injury or occupational disease insurance, and the disability caused by work-related injury or occupational disease insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees the relevant provisions of the state. Article 53 Employees shall participate in child-bearing insurance, and the child-bearing insurance premiums shall be paid by employers rather than employees the relevant provisions of the state.

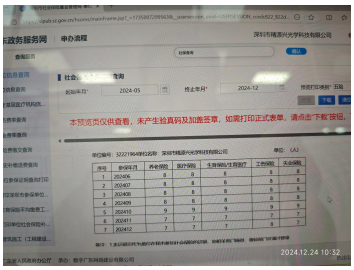
Evidence

Status
Open*

Time given to resolve
60 days

Verification method
Follow up audit

Area of non-compliance/non-conformance
Local law
Base code



Insufficient social insurance participated.jpg

* PDF generated at 17:15 (UTC) on 02 Jan 2025. View this finding on the Sedex platform for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) All employees' wages were calculated by hourly rate basis by cash on or before 7th of each month for previous month.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker renumeration

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

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	174.0
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	40.0
	Required hours per month	168.0

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	18.0
	Max hours per month	82.0
Minimum legal wage	Min per hour	13.56
	Min per day	108.51
	Min per week	542.53
	Min per month	2360.0
Actual minimum wage	Actual per hour	13.56
	Actual per day	108.51
	Actual per week	542.53
	Actual per month	2360.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	20.34
	Actual per day	40.69
	Actual per week	420.36
	Actual per month	1641.97

Wage analysis

Number of workers' records checked	10

Provide the date and details of the records	3 sampled employees from September 2024 (random month). 6 sampled employees from October 2024 (random month). 10 sampled employees from November 2024 (current paid month). Note: The facility established on May 06, 2024 and started to production since May 07, 2024. 3 sampled workers joined to the facility since October 2024 and 4 sampled workers joined to the facility since November 2024.
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?	Not applicable
Indicate the breakdown of workforce per earnings	100% workforce earning the legal minimum wage.
Are there any bonus schemes used?	Yes Post allowance was paid to workers monthly.
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: 1. The site established wages and benefits policy and procedure, which ensure all employees' minimum wage met the legal requirement. 2. The site has a wage improvement plan for all employees. 3. There was an annual review when local wage rates were examined. 4. The site regularly conducted living wage statistics which updated estimates of family living expenses and living wage on sampled workers, the living wage including transportation, education, food, clothes, housing, energy using, unexpecting needs and savings, etc. The living wage "RMB2,508/month" was calculated by the facility in 2024 year. 5. The minimum wage was RMB3,360/month (i.e Base wage RMB2,360 + Post allowance RMB1,000), which exceeds the living wage calculated by the facility. Evidence examined: 1. Wages and benefits policy and procedure. 2. Local and national laws. 3. Local legal min wage documents. 4.Worker interview and management interview. 5. Living wage statistics.

6. Working hours are not excessive

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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	1. Policies and Procedures: R There was procedure for working hours. As per the policy, the normal working hours were 8 hours per day and 40 hours per week. Overtime work would be arranged when production needed. There was a procedure on the control of working hours to meet the legal requirements. 2.Resources: R The admin manager was identified as responsible for work hours including normal work, overtime, rest time, which to ensure the working time compliance with legal law/ETI code. Continuous training was provided for relevant employees every year, and they learn the relevant laws and regulations regularly. 3.Communication and Training: FIR According to working hours procedures, which includes assessment and refresher training. The written training records were in place. However, communications and/or training is not effective because the sampled workers did not know the work time, overtime and rest day as the limit of legal law. 4.Monitoring: FIR Evidence of monitoring working hours procedures and metrics collection defined by procedure and evidence of implementation available.Major gaps in monitoring of procedures that do not ensure sufficient management of working hours on an ongoing basis.i.e the monthly overtime was exceeded the limit of legal law on a regular basis. For the glasses factory, normally, there was a risk of exceeding monthly overtime hours. The facility did not ensure the monthly overtime hours control within 36 hours as the limit of legal requirement.

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	ZAF600757792

Systems and evidence examined to validate this code section	Current Systems: 1.The site has a working time management system including policies, processes, records of work time, overtime and annual leave etc. The facility established on May 06, 2024 and started to production since May 07, 2024. 2.Through worker interview, employees volunteered to work overtime. 3.The facility adopted fingerprint/face recognition scanning system to record working hours for all employees. 4.Procedure document described the workers working 8 hours a day, 40 hours a week, rest on Saturday and Sunday etc. Actually the employees worked for 5 days a week in 1 shift. There was 1 shift for all workers: 8:00~12:00, 13:30~17:30. Overtime: 18:00~20:00 if necessary. The workers worked on Saturday if necessary, rest on Sunday. 5.There was no obvious peak month in past year. 6.During audit, the payroll records from May 2024 to November 2024 and attendance records from May 07, 2024 to December 24, 2024 (audit day) were provided for review. As per review of sampled employees' payrolls and attendance records from September 2024, October 2024 and November 2024 (current month), it was noted that the maximum daily overtime hours, weekly total working hours and consecutive working days for all sample population employees were 2 hour per work day, 58 hours per week and 6 days respectively. Evidence examined: 1. Working hours policy and process. 2. Local and national laws. 3. Workers contracts. 4. Attendance records. 5. Production and quality records to cross check hours. 6. Management interview and worker interview.

Findings: non-compliances

ZAF600757792

Non-compliance

Due 2025-03-03

Code area
6 Working hours are not excessive

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.

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)

Description
Monthly overtime hours exceeded the legal requirement.
Through attendance records review from May 07, 2024 to December 24, 2024 (audit day) and worker interview, it was noted that sampled employees worked in excess of the statutory overtime hour limits. A review of attendance records for September 2024, October 2024 and November 2024 yielded the following:
(1) 2 out of 3 sampled employees in excess of 36 overtime hours per month (i.e. maximum 70 hours) in September 2024.
(2) 4 out of 6 sampled employees in excess of 36 overtime hours per month (i.e. maximum 72 hours) in October 2024.
(3) 6 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 82 hours) in November 2024.
Note: The facility established on May 06, 2024 and started to production since May 07, 2024. 3 sampled workers joined to the facility since October 2024 and 4 sampled workers joined to the facility since November 2024.
月加班时间超过法定要求。
通过2024年5月07日至2024年12月24日（审核当日）的考勤记录审查和工人访谈，发现抽样员工的工作时间超过了法定加班时间限制。对2024年9月、2024年10月和2024年11月的出勤记录进行审查后得出以下结论：
（1）2/3名抽样员工的2024年09月加班时间超过了每月法定的36小时标准，最高为70小时。
（2）4/6名抽样员工的2024年10月加班时间超过了每月法定的36小时标准，最高为72小时。
（3）6/10名抽样员工的2024年11月加班时间超过了每月法定的36小时标准，最高为82小时。
注：该工厂成立于2024年5月06日，自2024年05月07日起开始生产。3名抽样工人自2024年10月以来加入该工厂，4名抽样工人从2024年11月以来加入工厂。

Corrective and preventative actions
It is recommended that the facility should ensure the overtimes of workers be in accordance with the legal requirements.
建议企业应确保加班时间符合国家法律。

Local law reference
Labor Law of the People's Republic of China, 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 month shall not exceed thirty-six hours.

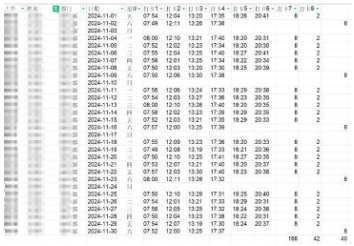
Evidence

Status
Open*

Time given to resolve
60 days

Verification method
Follow up audit

Area of non-compliance/non-conformance
Local law
Base code



NC-The monthly overtime exceeded 36 hours in Nov 2024.jpg

* PDF generated at 17:15 (UTC) on 02 Jan 2025. View this finding on the Sedex platform for live updates and closure details.

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?	N/A. Overtime hours on normal working days, rest days and holidays were compensated by 150%, 200% and 300% respectively of normal wage standards.
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?	56.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	58.0
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	Some Improvements Recommended
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.Policies and Procedures: R The site had a detailed no discrimination practiced management policy and procedure. And the relevant procedure has been implemented to ensure compliance with this policy. The policies and procedures were reviewed and updated regularly. 2.Resources: SIR The admin manger was responsible for communicating, implementing and checking compliance that no discrimination is practiced, specific role identified, undertook the training, learned the relevant laws and regulations to ensure that the factory's policy is implemented. However, he did not have skill to implement the potential discrimination. 3. Communication and Training: SIR Training is conducted according to a documented plan. But no training for potential discrimination. 4.Monitoring: R The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: 1.There was an internal grievance process. All sampled employees were aware of the grievance channels in case they encountered any discrimination cases. 2.As informed by interviewed employees, most employees spoke highly of the facility owner. 3.No employee was required to do the examination of the hepatitis B virus and HIV. Female workers in this facility were not required to take pregnant tests before or during their employment. 4.Anti-discrimination procedures for hiring, compensation, promotion and access to training were available during the audit. Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work. 5.There was no evidence of sexual harassment. Evidence examined: 1. Anti-discrimination policy and social accountability manual. 2. The hiring and termination procedure, leave application records and employee handbook. 3. Attendance records. 4. Training records. 5. Termination records. 6. Interview with management and workers.

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)	15%
Three most common nationalities in managerial and supervisory roles	The managerial and supervisory roles were 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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: R The site has a detailed employment management which includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it would be implemented. 2.Resources: R The Admin supervisor was responsible for ensuring compliance with the policy. Based on employees' interview and document review, the specific role identified as responsible was documented and all employees were notified. Continuous trainings were provided for relevant employees every year, and they learned the relevant laws and regulations regularly. 3.Communication and Training: SIR There was a well-established training programmer in place regarding employment, but partial key persons were not aware of their responsibilities. 4.Monitoring: SIR Employment breaches were effectively monitored, and overall performance was not monitored by the relevant senior management.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: 1.The site has a recruitment management system to ensure the effectiveness of recruitment. 2.All workers were recruited by the factory directly and had properly signed contracts with the factory. Workers pay no recruitment fee at any stage of the recruitment process. 3.All workers were clear the content of contracts as worker interview, such as wage, work time, work place, benefits etc. 4.Additionally, all of the workers confirmed all terms of employment contract and were properly provided with one copy of the labour contract for his or her reference. 5.No labour agency was used to hiring workers. 6.No temporary worker or home worker was identified by auditor. 7.HR department took charge of the entire recruitment process. The relevant HR personnel had been trained and assessed on legal and ethical requirements and followed the recruitment management procedure. Evidence examined: 1. Recruitment policy. 2. The hiring and termination practices. 3. Personal files and labour contracts. 4. Interview with management interview and workers.

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%
Percentage of workers employed as apprentices, trainees or interns	0.0%

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	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: R Factory had established documented policy and procedures on sub-contracting and homeworkers, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review. 2.Resources: SIR Documentation was not clearly assigned responsibilities because the factory did not have sub-contracting or homeworkers. The admin manager was responsible for human rights including sub-contracting or homeworkers. 3.Communication and Training: SIR No risk assessment, training and communication records of sub-contracting or homeworker management were conducted because the factory did not have sub-contracting or homeworkers. 4.Monitoring: SIR Sub-contracting and homeworkers using responsibly breaches were effectively monitored. However, the responsibilities for monitoring and targets or key performance indicators were not defined and utilised.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: 1. The site had a sub-contracting and homeworkers used responsibly management policy and procedure. 2. There were 2 sub-contracting processes for the facility: Electroplating and spraying. As management interview, all the sub-contracting processes were known by their clients. 3. As per management interview and factory tour, there was no homeworker used in the facility. Evidence examined: 1.List of approval suppliers. 2.Production records. 3.Interview with management and workers.

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 homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No Through supplier control documents and management interview, it was noted that their suppliers did not use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No Through facility tour, worker and management interview, it was noted that the worker's capacity was enough for production. No any unrecorded or undeclared sub-contracting on site.
Are any sub-contractors used?	Yes

Sub-contractor 1	**Processes subcontracted**	Electroplating or Spraying process
	Name of factory	Shenzhen Yarui Vacuum Nanotechnology Co., Ltd/ 深圳雅锐真空纳米科技有限公司
	Address	301, Building E (Factory Building 3), No. 10 Jixiang 2nd Road, Pingxi Community, Pingdi Street, Longgang District, Shenzhen/深圳市龙岗区坪地街道坪西社区吉祥二路10号E栋（厂房三）301
	Dates used	May 07, 2024
Sub-contractor 2	**Processes subcontracted**	Electroplating or Spraying process
	Name of factory	Shenzhen Fangyuan Qianse Technology Development Co., Ltd/ 深圳市方元千色科技开发有限公司
	Address	Building 2, Phase 1, Hemei Industrial Zone, Nianfeng Community, Pingdi Street, Longgang District, Shenzhen/深圳市龙岗区坪地街道年丰社区和美工业区一期二栋
	Dates used	May 07, 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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: R Factory had established documented policy and procedures on harsh or inhumane treatment, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review. 2.Resources: R There was a reponsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. It can be effectiveness of the management structure to achieve compliance sustainably over time. 3.Communication and Training: SIR There was a well-established training programmer in place regarding the policies and procedures. No assessment of effectiveness for the training. 4.Monitoring: SIR There was detailed staff handbook available concerning personnel policies grievance, equal opportunities, etc. Sampled employees stated that they were comfortable to express their viewpoints and most of their concerns were solved. However, there was no awareness of evaluation effectiveness.

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			

Systems and evidence examined to validate this code section	Current Systems: 1. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Through worker interview confirmed that employees were aware of the disciplinary procedure. 2. As per management interview, document review and worker interview, there was a policy on Harsh Treatment. 3. There was an internal process for grievance, which was an anonymous suggestion box, where employees could report any grievances (harassment, bullying and discrimination). Any received complaint would be handled by management, without any reprisal for the employee in question. Evidence examined: 1.The relevant policy on prevention of harassment and abuse. 2.Internal grievance procedure documentation. 3.Disciplinary action records. 4.Grievance records. 5.Training records. 6.Interview with management and workers.

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 was an internal process for grievance, which was an anonymous email address and Suggestion box, where workers could report any grievances (harassment, bullying, discrimination etc).
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	Robust Management Systems
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	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: R Factory had established documented policy and procedures on environment protection, take regularly review & update the policy and posted on employee notice board. The policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review. 2.Resources: SIR The Admin supervisor was responsible for ensuring compliance with the policy. And the specific role identified as responsible was documented. Continuous trainings were provided for relevant employees every year, and they learned the relevant laws and regulations regularly. However, the admin supervisor knew his role but did not adequate skill to implement them. 3.Communication and Training: SIR Training and communication regarding the policies have been conducted to employees. The relevant records were provided for review, there was no assessment of effectiveness for the training. 4.Monitoring: SIR The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the noncompliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis. However, partial data of Usage/discharge analysis were not records.

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section	Current Systems: 1.The facility provided fixed pollution discharge registration receipt record for review. 2. Mr. Wu/general manager was responsible for continuous improvements in the environmental issues. 3. The facility had established written policy on environmental protection. And risk assessment has been conducted for environment. 4. The facility learned about the environmental impact of the site and conducted training for all employees. 5. No fine/prosecution for non-compliance with environmental regulations was identified in past one year. 6. The facility had collected the related laws of environmental protection and they were updated regularly. Evidence examined: 1.Fixed pollution discharge registration receipt record. 2.Environment protection policy. 3.Laws of environmental protection. 4.Training records. 5.Worker and management interview.

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 such 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 The facility made an emergency response plan for the impact of climate change, provided the training for employees regularly.

Attachments

Social Audit Photo record ZAA600105574, ET2412242401.pdf

Social Audit onsite CAP ZAA600105574, ET2412242401.pdf

Sedex

For more information visit https://www.sedex.com