

# 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	ZC5000012573	Auditor company name	LRQA
Date of audit	2024-10-09	Audit conducted by	Sedex member
Audit pillars	Labour Standards   Health and safety		

## Site details

Sedex site reference	ZS1000013613	Site name	ZCMIM CORPORATION CO LTD
Business name	ZCMIM CORPORATION CO LTD	Site address	523013 No.4, Jinyuling Road, North Street, Dongcheng Street, Dongguan City, Guangdong Province, China, Dongguan, CN
Site phone	13147007531	Site email	603212551@qq.com

# Audit parameters

Time in and out	Day 1	
	In	09:00
	Out	16:00
Audit type	Periodic	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Mr. Xiao Zhengde / QA Supervisor	
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)

Nil

Lead auditor

Sean Yu

APSCA Number

21701227

Additional auditor

Lewis Long

APSCA Number

21701358

Date of declaration

2024-10-09

# 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. Xiao Zhengde
Title	QA Supervisor
Date of declaration	2024-10-09

## Summary of findings





































Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC <a href="#">ZAF600648781</a>
	3.N Maintain a log of all hazardous substance...	§2	NC <a href="#">ZAF-</a>
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§3	NC <a href="#">ZAF600648782</a>
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§4	NC <a href="#">ZAF600648783</a>

## Local law issues

§1	In accordance with Law of PRC on Work Safety article 45. Production and business entities must provide employees with labor protection products that comply with national standards or industry standards and supervise and educate employees to wear and use them in accordance with the rules of use. Article 47, the production and business unit shall arrange funds for the provision of labor protection equipment and safety production training.
§2	In accordance with Regulation for Safety of Dangerous Chemical article 20, entities that produce, store, and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, firefighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely.
§3	In accordance with Social Insurance Act of the People's Republic of China, article 2, the state establishes basic pension insurance, basic medical insurance, occupational injury insurance, unemployment insurance, maternity insurance to form the social security system, to protect citizens' right to receive material assistance from the state and society in accordance with the law from old age, illness, work injury, unemployment, childbirth, etc. Article 4. Employers and employees within the territory of the People's Republic of China should pay social insurance premiums in accordance with the law.
§4	In accordance with the People's Republic of China Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.



# 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	ZC5000012573	
Sedex site reference	ZS1000013613	
Company name	ZCMIM CORPORATION CO LTD	
Business ownership type	GOODS	
Site name	ZCMIM CORPORATION CO LTD	
Site name in local language		
GPS location	GPS address	No. 4, Jinyuling Road, North Street, Dongcheng Street, Dongguan City, Guangdong Province, China
	Coordinates	N23°3'46" E113°48'27"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mr. Xiao Zhengde
	Job title	QA Supervisor
	Phone number	13147007531
	Email	603212551@qq.com
Applicable business and other legally required business license numbers and documents	Business License Number: 91441900MA51XRN076 Valid period: from July 2, 2018 to Long term.	

## Site activities

Site function	Factory Processing/Manufacturer
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## Site activities

Site activities	Primary	Manufacture of other fabricated metal products n.e.c.
	Secondary	
	Other	
Product type	Metal injection molding products	
Process overview	The factory specialized in the manufacturing of Metal inection molding products. The main production processes included: Injection molding, Debinding, Sintering, Cleaning, Grinding, Polishing, Sand blasting, Assembly, Inspection and packing. The main production machines included injection molding machine 30 sets, debinding machine 10 sets, sintering machine 10 sets, 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?	Yes	
What is the area of audited site to its boundary?	9479m <sup>2</sup>	
Building 1	Last construction works on site	2005
	If building is shared, provide details	Nil
	Number of floors	3
	Description of floor activities	1F: Debinding and sintering 2F: Assembly, inspection and packing 3F: Office
Building 2	Last construction works on site	2005
	If building is shared, provide details	Nil
	Number of floors	2
	Description of floor activities	1F: Injection molding 2F: Warehouse

## Site scope

Building 3	Last construction works on site	2005
	If building is shared, provide details	Nil
	Number of floors	5
	Description of floor activities	1F: Raw material warehouse and finished product warehouse 2F: Cleaning, grinding, polishing 3F: Sand blasting 4F: Empty 5F: Empty
Building 4	Last construction works on site	2005
	If building is shared, provide details	Nil
	Number of floors	5
	Description of floor activities	1F: Kitchen and Canteen 2F: Dormitory room 3F: Dormitory room 4F: Dormitory room 5F: Dormitory room
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?	Yes
Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional

## Worker accommodation and transport

Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	All All accommodation was included in this audit.
Do children also live in the accommodation?	No
Does the site organise worker transport to the worksite?	Not provided No transport is provided for workers.

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	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?	Yes The factory has conducted those negative impacts assessment each year in their internal audit.

## Site assessments

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	<p>Yes</p> <p>The factory had established and implemented Human Rights Impact Assessment system and conducted the HRIA once per year in their internal audit.</p>
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# Worker analysis

Gender disaggregated data available      Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	79 (50.6%)	77 (49.4%)	- -	156 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	79 (50.6%)	77 (49.4%)	- -	156 (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	79 (50.6%)	77 (49.4%)	- -	156 (100%)
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	73 (46.8%)	65 (41.7%)	- -	138 (88.5%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	73 (46.8%)	65 (41.7%)	- -	138 (88.5%)

\* % of total workforce

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

The ethnic background of all management and production workers was mainland Chinese, 88% workers were migrated from other provinces of Guangxi and Hunan etc. All workers were recruited directly by the factory.

Workers by age

	Men	Women	Other	Total
18 - 24 years old	3 (1.9%)	5 (3.2%)	- -	8 (5.1%)
15 - 17 years old	0 (0%)	0 (0%)	- -	0 (0%)
Under 15 years old	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Workers by employee type

	Men	Women	Other	Total
Employees in management positions	4 (2.6%)	4 (2.6%)	- -	8 (5.1%)
Supervisors or team leaders	3 (1.9%)	2 (1.3%)	- -	5 (3.2%)
Administrative staff	2 (1.3%)	3 (1.9%)	- -	5 (3.2%)

\* % 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 There was no obvious peak or non-peak season in the factory.

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	83%	81%	-	164%

## 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	79 (50.6%)	77 (49.4%)	- -	156 (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	79 (50.6%)	77 (49.4%)	- -	156 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details Nil

# Worker interview summary

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

4 groups of 5

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) Nil
What did the workers like the most about working at this site?	Freedom of movement Job security
Additional comments	Monthly wage could be paid on time and workers could easily leave even during working day.
Attitude of workers' committee/union representatives	The workers representative attended the whole assessment process. They were open to assessor. They stated that they were elected by workers. Workers could raise suggestion or complaint through workers representative meeting. They would participate in grievance solution.
Attitude of managers	Factory management were cooperative with LRQA staff and provided full access to the whole facility. Management provided required documents and records in time, accompanied assessors with factory tour and helped select workers for interviews. Management staff attended the closing meeting, confirmed all the findings and signed on the CAPR without any argument.

## Workers interviewed by type

	Total
Permanent workers	26
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26

## Workers interviewed by group/individual

	Men	Women	Other	Total

## Workers interviewed by group/individual

Workers interviewed in groups	10	10	-	20
Workers interviewed individually	3	3	-	6

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	12	11	-	23
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	12	11	-	23

# 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 (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

\* 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 (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

\* 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

No accident occurred in the factory during last year.

## 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 (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	<p>Current systems: The factory has established written policy and procedures to meet the Code, human rights and labour standards required by local law and customers. Mr. Xiao Zhengde / QA Supervisor was responsible for compliance with the Code, human rights and labour standards to all appropriate parties, including its own suppliers, and the implementation, communication to all employees through trainings, handbooks and postings at the facility.</p> <p>Details:            1.Business license            2.Employee Handbook            3.Factory Manual contains details of Code and labour standards required by local law and customers.            4.The written policy including human rights.            5.Appointment book of person responsible for implementing standards concerning Human rights            6.Factory rules            7.Social compliance management handbook            8.Training records of the Code, social compliance, human rights            9.Employee interview, employees could raise the human rights issues by suggestion box confidentially or call the hotline to the management who was responsible for implementing standards concerning Human rights directly.</p>		

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	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	Auditor found that the facility had established employment management procedure, and it was implemented properly.

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

1. The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification.
2. The employees obtained their job by friend's recommendation or by the factory recruitment.
3. Workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
5. No forced, bonded or involuntary prison labour was identified during the audit.

**Details:**

The facility's policy to ensure employment is freely chosen was reviewed. The policy includes the following clause: the facility does not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; there is no forced, bonded, or involuntary prison labour; and employees are free to leave their employer after reasonable notice.

Labour contracts with notice periods.

Training of forced, bonded or involuntary prison labour for all employees at the time employee, and re-fresh training was conducted once per year for all employees.

As per workers interview, it was noted that they are free to leave their working stations once their shifts end; all overtime workings were voluntary; and they are not required to pay any 'deposits' or leave their ID cards.

1. Employees' manual, Factory rules
2. Personnel files records
3. Resignation records
4. Management and worker 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	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Auditor found that the facility had established employment management procedure, and it was implemented properly.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory had established the effective employment policies &amp; program to meet the Code and labour standards required by local law and customers. Mr. Xiao Zhengde/ QA Supervisor was responsible for compliance with the Code implementation and the Code was communicated to all employees through trainings, handbooks and postings at the facility.</p> <p>Details: 1. Employees' manual, Factory rules 2. Personnel files records 3. Training records 4. Labor contracts 5. Management and worker interview</p>		

## 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	0%
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 ethnic background of all management and production workers was mainland Chinese, 88% workers were migrated from other provinces of Guangxi, Hunan, etc. All workers were recruited directly by the factory.



## Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
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Were recruitment fees or costs identified during worker interviews?	No
	There was no such cost during employment as per 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	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Auditor found that the facility had established freedom of association and right to collective bargaining management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory has written policy on freedom of association, which states that workers are free to form any union or any form of other workers organization in the facility. Currently, no labor union was established in the factory. There was no collective bargain agreement signed in the factory. A worker committee was available, 3 worker representatives were selected by workers. All employees have the right to join worker committee. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. The workers could raise any issue or express their concerns through suggestion box. There was a relevant written policy / procedure documented in place. The meeting between factory management and worker committee was conducted quarterly.</p> <p>Details: 1.The policy on freedom of association 2.Worker representative elected records 3.Interview with workers committee members 4.Management and worker interview</p>		



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

Data points

Are trade unions allowed by law in the national context?	No
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?	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	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	Some Improvements Recommended
Explanation for management systems grades	Auditor found that the facility had established Environment, Health and Safety management procedure onsite, however it was not implemented properly, and related findings were raised.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.H Where identified as necessary to reduce r...	§1	NC <a href="#">ZAF600648781</a>
	3.N Maintain a log of all hazardous substance...	§2	NC <a href="#">ZAF-</a>

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

**Current systems:**

The facility generally provided an adequate work environment and maintains a comfortable temperature throughout. The electrical system was in a good condition. All switches in the electrical control panels have been labelled. The factory posted the evacuation plans at work floors, which indicates escape routes. Exit signs were installed. The facility has provided enough fire extinguishers in all working sections. A functional fire alarm system can be found in the facility. The facility's policy and procedures were communicated through the notice board in the local language. Drinking water was provided and installed in workshops. Sufficient and proper supplies/items were stocked in all of the first aid kits.

**Details:**

- 1.Fire-fighting equipment inspection and maintenance records
- 2.PPE training
- 3.Workplace occupational hazards factor testing report
- 4.License for special operation
- 5.Registration of special equipment
- 6.Inspection certificate of special equipment
- 7.Certificate of special equipment operator
- 8.Fire drill records
- 9.First aider certificates
- 10.Drinking water testing report
- 11.Interviews with EHS manager

# Findings: non-compliances

ZAF600648781

Non-compliance

Due 2023-12-11

## Code area

3 Working conditions are safe and hygienic

## Status

Closed (2024-10-09)\*

## 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

During this assessment, all polishing workers were wearing disposable masks during operation.

## Area of non-compliance/non-conformance

Local law

## Description (carried over)

It was noted that the factory had provided the personal protective equipment such as dust mask to its worker in polishing section in 2F of production building #3. However, 1 out of 8 workers wear disposable mask rather than dust mask. 在此次审核过程中, 审核员发现工厂给抛光工人提供了个人劳动防护用品如防尘口罩, 但在3号厂房2楼抛光车间8名中的1名工人佩戴了一次性口罩而不是防尘口罩。

## Corrective and preventative actions

It is recommended that factory should provide appropriate PPE to workers and regular PPE training to workers, conduct regular PPE safety inspection at workplace, and develop and implement a Personal Protective Equipment (PPE) program to protect employees from workplace hazards that may cause bodily injury.

## Corrective and preventative actions (carried over)

It is recommended that factory should provide appropriate PPE to workers and regular PPE training to workers, conduct regular PPE safety inspection at workplace, and develop and implement a Personal Protective Equipment (PPE) program to protect employees from workplace hazards that may cause bodily injury.

## Local law reference

In accordance with Law of PRC on Work Safety article 45. Production and business entities must provide employees with labor protection products that comply with national standards or industry standards and supervise and educate employees to wear and use them in accordance with the rules of use. Article 47, the production and business unit shall arrange funds for the provision of labor protection equipment and safety production training.

## Evidence



PPE wear.JPG



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ZAF-

Non-compliance

<b>Code area</b> 3 Working conditions are safe and hygienic	<b>Status</b> Open*
<b>Workplace requirement</b> 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.	<b>Time given to resolve</b> 30 days
<b>Issue title</b> 240 - No/inadequate safety measures/anti-explosion measures for chemicals (e.g. no anti-leaking system/secondary container/unbundled)	<b>Verification method</b> Desktop audit
<b>Description</b> It was noted that factory did not have safety facilities such as anti-leakage facilities for 2 barrels of anti-rust oil stored in material warehouse at 2/F of production building #1. 审核员发现工厂#1号厂房2楼物料仓库存放了2桶防锈油没有防渗漏设施。	<b>Area of non-compliance/non-conformance</b> Local law Base code
<b>Corrective and preventative actions</b> It is recommended that factory should provide proper chemical safety training to workers, conduct regular chemical safety inspection, and install the relevant safety facilities in workshop or warehouse for its dangerous chemical material used.	
<b>Corrective and preventative actions (carried over)</b> It is recommended that factory should provide proper chemical safety training to workers, conduct regular chemical safety inspection, and install the relevant safety facilities in workshop or warehouse for its dangerous chemical material used.	
<b>Local law reference</b> In accordance with Regulation for Safety of Dangerous Chemical article 20, entities that produce, store, and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, firefighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely.	



## Evidence



[NC-no anti-leakage  
facility.jpg](#)



\* PDF generated at 14:04 on 14 Oct 2024. [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
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?	Yes  The factory has obtained valid structural permit and inspection report for their buildings as per local law.
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	Auditor found that the facility had established anti-child labour management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory would verify all workers' original ID cards at the time of recruitment and keep the photocopies of ID cards in the personnel files. All employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth. Hiring procedure and related protection policy of young workers were also kept in place. No child labour or juvenile workers was working at the factory currently.</p> <p>Details: 1. Personal file 2. Roster of employees 3. Management and employee interview</p>		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	5%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	19
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	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Auditor found that the facility had established wages and benefits management procedures onsite, however, it was not implemented properly because insufficient social insurance participation finding was noted.

### 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 <a href="#">ZAF600648782</a>

## Systems and evidence examined to validate this code section

### Current systems:

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

During this audit, the factory provided 12 months' payrolls (from September 2023 to August 2024) for review. A sampling of these provided records for the months of August 2024 (most recent month), May 2024 (random month) and December 2023 (random month) were reviewed. As per factory management and provided payrolls, wages for all workers were calculated on hourly-rated basis and paid by Bank on or before the end of each month. Based on provided payrolls and time attendance records, both workers' basic wages and overtime wages met legal requirements, the hourly wage was paid of RMB 10.92, which was equal to the local legal minimum wage standard of RMB 1,900 per month as equivalent to RMB 10.92 per hour since December 1, 2021.

Overtime wage was paid at 150%, 200% and 300% of normal rate for overtime hours on normal working days, rest days and public holidays respectively, and total paid wages ranged from RMB 3605 to RMB 4170 per month. The gap between reported wages and legal requirements was nil and the percentage of workers being paid below the minimum wage was nil.

For social insurance, a total of 164 employees were eligible to receive five types of social insurances in September 2024 according to the law. However, through review of social insurance enrollment list, only 159 employees were enrolled in pension insurance, unemployment insurance, medical insurance, occupational injury insurance and child-bearing insurance. Remark: 5 employees had participated in commercial insurance, with the effective period from March 1, 2024 to February 28, 2025.

A wage slip detailing: basic wages, hourly wage rate, normal working hours, overtime working hours, holiday working hours, normal working hours wage, overtime working hours wage, statutory holidays allowance, paid leave, allowance (working position, full attendance allowance), total monthly wages, deduction (utility bills, social insurance and tax) and net wage was provided to each worker.

### Details:

1. Employee handbook
2. Wages and benefits policy
3. Annual leave records
4. Resigned workers payroll records
5. Payroll and attendance records
6. Social insurance and payment receipts

# Findings: non-compliances

ZAF600648782

Non-compliance

Due 2024-01-10

## 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

60 days

## Issue title

424 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - isolated

## Verification method

Desktop audit

## Description

It was noted that a total of 164 employees were eligible to receive five types of social insurances in September 2024 according to the law. However, through review of social insurance enrollment list, only 159 employees were enrolled in pension insurance, medical insurance, occupational injury insurance, unemployment insurance and child-bearing insurance. (Remark: 5 employees had participated in commercial insurance, with the effective period from March 1, 2024 to February 28, 2025).

在此次审核过程中, 审核员发现在164名符合参保条件的员工中, 只有159名参加了养老保险、医疗保险、工伤保险、失业保险和生育保险。工厂为5名员工购买了商业保险, 保险期限从2024年3月1日至2025年2月28日。

## Area of non-compliance/non-conformance

Local law

## Description (carried over)

It was noted that a total of 141 employees were eligible to receive five types of social insurances in September 2023 according to the law (There were 152 employees in the factory, included 4 employees reached retirement age and 7 employees newly hired since September 2023). However, through review of social insurance enrollment list, only 137 employees were enrolled in pension insurance, medical insurance, occupational injury insurance, unemployment insurance and child-bearing insurance. (Remark: 4 employees had participated in commercial insurance, with the effective period from February 22, 2023 to February 21, 2024) 在此次审核过程中, 审核员发现在141名符合参保条件的员工中, 只有137名参加了养老保险、医疗保险、工伤保险、失业保险和生育保险。工厂为4名员工购买了商业保险, 保险期限从2023年2月22日至2024年2月21日。

## Corrective and preventative actions

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

## Corrective and preventative actions (carried over)

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

## Local law reference

In accordance with Social Insurance Act of the People's Republic of China, article 2, the state establishes basic pension insurance, basic medical insurance, occupational injury insurance, unemployment insurance, maternity insurance to form the social security system, to protect citizens' right to receive material assistance from the state and society in accordance with the law from old age, illness, work injury, unemployment, childbirth, etc. Article 4. Employers and employees within the territory of the People's Republic of China should pay social insurance premiums in accordance with the law.

## Evidence



缴费基数	缴费比例	缴费金额
10000	10%	1000
20000	10%	2000
30000	10%	3000
40000	10%	4000
50000	10%	5000
60000	10%	6000
70000	10%	7000
80000	10%	8000
90000	10%	9000
100000	10%	10000

[NC-Insufficient social insurance-2.JPG](#)

[NC-Insufficient social insurance-1.JPG](#)



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## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers?	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	Non applicable
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	3.0
	Max hours per week	Non applicable
	Max hours per month	76.0
Minimum legal wage	Min per hour	10.92
	Min per day	87.36
	Min per week	Non applicable
	Min per month	1900.0
Actual minimum wage	Actual per hour	10.92
	Actual per day	87.36
	Actual per week	Non applicable
	Actual per month	1900.0
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	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

## Wage analysis

Number of workers' records checked	78
Provide the date and details of the records	26 samples from August 2024 (most current month) 26 samples from May 2024 (random month) 26 samples from December 2023 (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	Based on the payroll records and attendance records provided by the factory, workers' minimum wages were paid above the local legal requirement, which was RMB 1900 per month as equivalent to RMB 10.92 per hour since December 1, 2021.
Are there any bonus schemes used?	Yes  Full attendance bonus, job position bonus
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	<p>Current systems: Wages and benefits paid for a standard working week meet, at a minimum, national legal standards; no industry benchmark standards and living wage requirement in local. Then no need to review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.</p> <p>Details:            1. Payroll records            2. Attendance records            3. Local legal minimum wage documents            4. Wages and benefits policy            5. Labor contracts for all employees            6. Pay slips of all interviewed workers            7. Workers and management interview</p>		

## 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	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Auditor found that the facility had established working hours management procedure onsite, however, it was not implemented properly because excessive monthly overtime finding was noted.

### 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 <a href="#">ZAF600648783</a>

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

**Current systems:**

There's a written policy concerning working hours and overtime hours, as well as a system for monitoring working hours and overtime hours. The factory keeps a finger scan attendance system to ensure the attendance system to be accurate. Policy and Procedures for special terms for young workers and pregnant women are also in place.

During this audit, the factory provided 14 months' time attendance records (from September 2023 to October 2024) for review. A sampling of these provided records for the months of August 2024 (most recent month), May 2024 (random month) and December 2024 (random month) were reviewed. Based on provided time attendance records, workers' working hours were 8-11 hours a day, 48-58 hours a week, with the average being 56 hours per week. The most continuous working days without rest were 6 while the average continuous working days without rest were 6.

**Details:**

1. Employee handbook
2. Wages and benefits policy
3. Annual leave records
4. Resigned workers time records
5. Payroll and attendance records
6. Production records

# Findings: non-compliances

ZAF600648783

Non-compliance

Due 2024-01-10

## 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

60 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

It was noted that the monthly overtime hours of 26 out of 26 randomly selected workers (from all sections) exceeded 36 hours in August 2024 with the highest of 74 hours; 26 out of 26 (from all sections) exceeded 36 hours in May 2024 with the highest of 76 hours; 26 out of 26 (from all sections) exceeded 36 hours in December 2023 with the highest of 75 hours; No workers had worked more than 3 overtime hours per day. 在此次审核中, 审核员发现在随机抽取的26名工人中, 有26名工人(来自于所有车间)的月加班时间在2024年8月超过36小时, 最高达到74小时; 在2024年5月, 随机抽取的26名工人中有26名工人(来自于所有车间)月加班时间超过36小时, 最高达到76小时; 在2023年12月, 随机抽取的26名工人中有26名工人(来自于所有车间)月加班时间超过36小时, 最高达到75小时。没有工人每天加班超过3小时。

## Description (carried over)

It was noted that the monthly overtime hours of 26 out of 26 randomly selected workers (from all sections) exceeded 36 hours in August 2023 with the highest of 88 hours; 26 out of 26 (from all sections) exceeded 36 hours in June 2023 with the highest of 83 hours; 26 out of 26 (from all sections) exceeded 36 hours in March 2023 with the highest of 87 hours; No workers had worked more than 3 overtime hours per day. 在此次审核中, 审核员发现在随机抽取的26名工人中, 有26名工人(来自于所有车间)的月加班时间在2023年8月超过36小时, 最高达到88小时; 在2023年6月, 随机抽取的26名工人中有26名工人(来自于所有车间)月加班时间超过36小时, 最高达到83小时; 在2023年3月, 随机抽取的26名工人中有26名工人(来自于所有车间)月加班时间超过36小时, 最高达到87小时。没有工人每天加班超过3小时。

## Corrective and preventative actions

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

## Corrective and preventative actions (carried over)

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

## Local law reference

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

## Evidence

The photograph shows a document titled "員工考勤打卡明細記錄" (Employee Attendance and Overtime Record). The document is a table with columns for employee name, date, and overtime hours. It shows multiple entries for various dates, with some entries indicating overtime hours exceeding 36 hours per month.

[NC-Monthly overtime hours exceeded 36 hours.JPG](#)

\* PDF generated at 14:04 on 14 Oct 2024. [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?	150%, 200% and 300% of normal rate for overtime hours on normal working days, rest days and public holidays respectively.
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	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	Auditor found that the facility had established Anti-discrimination management procedure and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory has written policy on anti-discrimination as well as policy on compensation, promotion, and training etc. New staff hiring policy and advertise indicates that no pregnancy or health check (HIV testing, HB check) was required. Gender and ethnic balance between workers and middle management is proper. There's grievance channel (suggestion box or anonymous phone line etc.) for workers to report any discrimination.</p> <p>Details: 1.Factory policy, hiring procedure. 2.Employee handbook. 3.Payrolls, training records. 4.Contracts, termination records.</p>		

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)?	80%
Representation of women in managerial roles (ratio of women workers to women managers)	5%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	2%
Three most common nationalities in managerial and supervisory roles	All managements and supervisors were from 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	Auditor found that the facility had established employment management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: Work performed was on the basis of recognized employment relationship established through national law and normal practice. The factory never used any home-workers or agency workers. No apprentice or temporary worker was working in the factory. The factory signs labour contracts with employees within 30 days since employment, and all workers can have their own a copy of the contract and pay slip. HR staff was aware of local law concerning above worker pattern.</p> <p>Details: 1.Factory policy, employee handbook 2.Labour contracts 3.Hiring and termination records 4.Personal files 5.Management and worker's interview</p>		

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	100.0%
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	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	Auditor found that the facility had established subcontracting management and anti-using home workers procedures and they were implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems: The factory has customer policy on sub-contracting, homeworking, and external processing, as well as written policy and procedure in place to control external working. The factory posted customers' Code of Conduct in the facility. Through site tour, documents review and management &amp; workers interview, no external working was being used currently.</p> <p>Details: 1.Factory policy, 2.Quality records and management &amp; workers interview 3.Site tour (check production process)</p>		

## 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  
The factory didn't allow their suppliers to use homeworker as per the policy and no homeworker was noted as per the suppliers' assessment reports.

### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
There was no such concern as per onsite tour, document review and interview.

Are any sub-contractors used? No

## 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	Auditor found that the facility had established Anti-harsh and inhumane treatment management procedures, and they were implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>Current systems:  The factory has established an anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited in this facility.  The disciplinary procedure only includes oral warning, written warning and education, which was confirmed through worker's interview.  The factory has established grievance mechanism with non-retaliation policy and allow workers to report issues anonymously. Related training records and grievance records / documented evidence were maintained in place.  Security practices were humane and comply with customers' expectation.</p> <p>Details:  1. Policy of prevention of harassment and abuse.  2. Internal grievance procedure documentation.  3. Training records  4. Employee interview</p>		





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?	Suggestion box had been installed in the workshop and workers could also choose to report any concern to manager if needed.
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	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	Auditor found that the facility had established environmental management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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

**Current systems:**

The site has established Environmental policy concerning environment issue (including hazardous waste disposal handling procedures), and the responsible management staff was aware of local laws / regulations governing environment, keeps the law up to date.

The factory has got the environmental impact assessment documents examined and approved by authorized environmental protection department. No pollution observed in the factory.

The factory conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.

The factory also established emergency reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and so on.

**Details:**

- 1.Environmental policy
- 2.Pollutant Discharge Registration
- 3.Risk assessment records
- 4.Emergency reduction target
- 5.Environmental impact report
- 6.Environmental project completion acceptance report
- 7.Hazardous waste disposal records
- 8.Workers and Factory management interview
- 9.Factory tour

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?	Nil
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 factory has established reduction targets for water consumption and discharge, waste, energy and green-house gas emissions.

# Attachments



[LRQA-CN-SMTA-287080\\_Photo Form\\_Zcmim Corporation Co.,Ltd\\_October 9, 2024.docx](#)



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