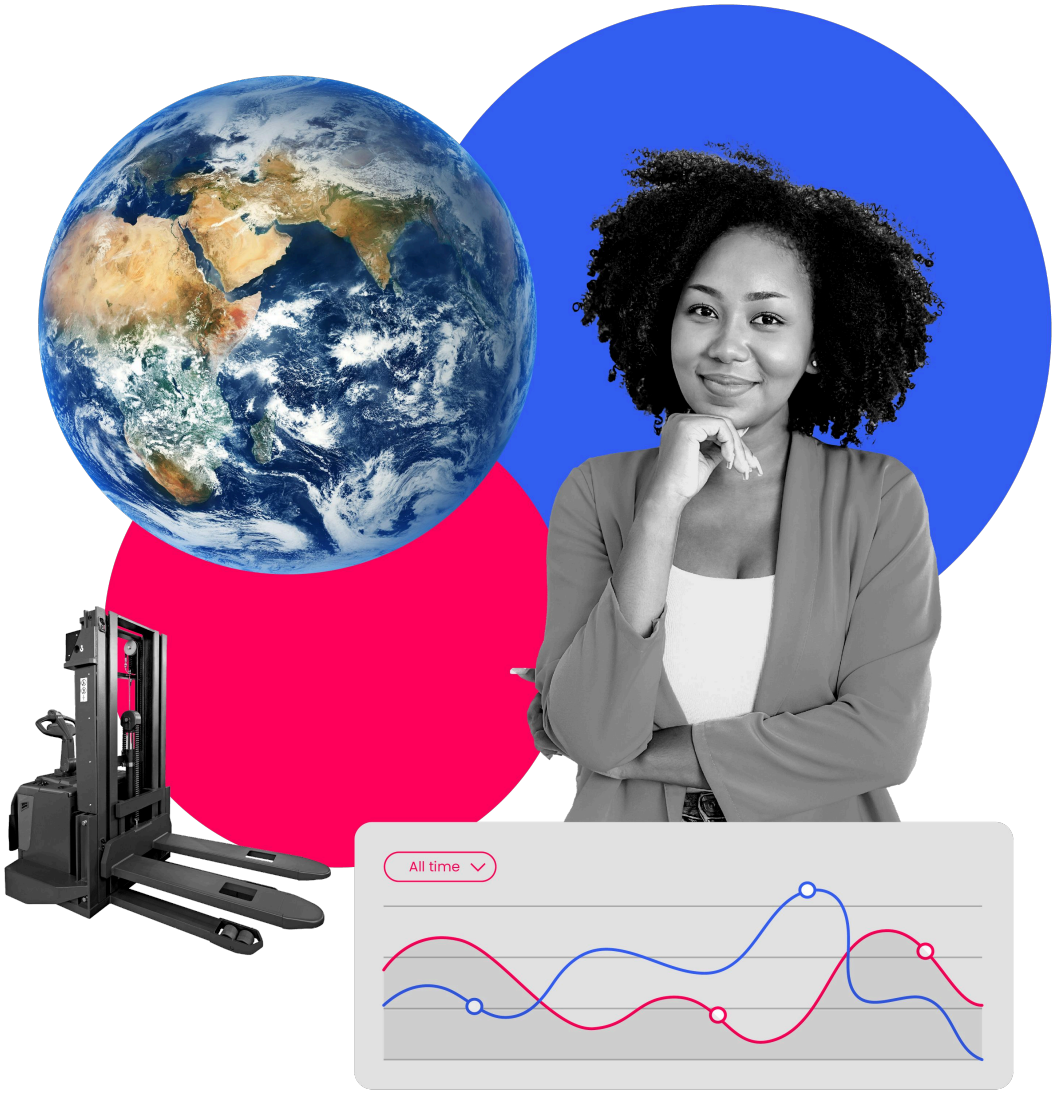
SMETA
powered by Sedex

Sedex Members Ethical Trade Audit Report

Version 7



Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

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Attachments

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and 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 code areas below.

2-pillar audits include:

- Labour standards:
  - 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
  - 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
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 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.

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Findings →

Audit details

Site details

Sedex site reference	ZS421332453	**Site name**	Huizhou Jayi Acrylic Products Co Ltd
Business name	Huizhou Jayi Acrylic Products Co Ltd	**Site address**	Building 7, Area C, Wan Yang Zhong Chuang Cheng, NO.1 Shuangyang Road Boluo County, Huizhou, Guangdong Province, China 广东省惠州市博罗县杨桥镇双杨路1号万洋众创C区7幢 Huizhou CN 516000

Audit details

Sedex company reference	ZC421268685	**Auditor company name**	Benchmarks Company Limited
Audit company address	Unit 9-11, 7/F., Block B, Proficient Industrial Centre,, 6 Wang Kwun Road, Kowloon Bay, Hong Kong, HK, -		
Date of audit	2026-11-11	**Audit conducted by**	Bessie Wang
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out	Day 1		Day 2	
	In	08:30	In	08:00
	Out	16:30	Out	12:00

← Contents

Findings →

Audit type	Periodic
Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Ms. Lin Guoqin / 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 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.		

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Findings →

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)	The semi-announced window of this audit is Nov 2-30 2026.

Lead auditor	Bessie Wang	**APSCA Number**	32400409
Additional auditor			
Date of declaration	2026-11-12		

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Findings →

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	Ms. Lin Guoqin
Title	manager
Date of declaration	2026-11-12

← Contents

Findings →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.D Give appropriate time and space for worke...	Base code	NC ZAF601700360
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC ZAF601700356
	3.H Where identified as necessary to reduce r...	Local law	NC ZAF601700358
	3.O Implement an appropriate electrical safet...	Local law	NC ZAF601700357
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601700361
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601700359
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601687109

← Contents

Management systems →

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

← Summary of findings

Site details →

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

✕ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC421268685	
Sedex site reference	ZS421332453	
Company name	Huizhou Jayi Acrylic Products Co Ltd	
Business ownership type	GOODS	
Site name	Huizhou Jayi Acrylic Products Co Ltd	
Site name in local language	惠州市嘉艺有机玻璃制品有限公司	
GPS location	**GPS address**	Building 7, Area C, Wan Yang Zhong Chuang Cheng, NO.1 Shuangyang Road Boluo County, Huizhou, Guangdong Province, China
	Coordinates	Latitude:N23°27'53.60",Longitude:E114°30 '3.67"
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Ms. Lin
	Job title	manager
	Phone number	18970065678
	Email	jiayihz@126.com
Applicable business and other legally required business license numbers and documents	Business license: 91441302MA55LH9H8R Valid from 25 November 2020 to long term.	

← Management systems

Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer Finished Product Supplier	
Site activities	**Primary**	Manufacture of glass and glass products
	Secondary	
	Other	
Product type	The factory mainly customized all kinds of acrylic products,storage box, display stands, pet item, furniture/household items, games, desktop organizers, hotel supplies etc	
Process overview	The factory mainly customized all kinds of acrylic products,storage box, display stands, pet item, furniture/household items, games, desktop organizers, hotel supplies etc.The main processes included cutting, edge grinding, polishing, punching, gluing and packing. The main production equipment included 3 polishing machines, 3 cutting machines,4 drilling machines and etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes
What is the area of audited site to its boundary?	6000m²

← Management systems

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2022
	If building is shared, provide details	Nil
	Number of floors	5
	Description of floor activities	1F: Cutting/Warehouse 2F: Cutting /Printing/ Polishing/Drilling 3F: Packing Office 4F: Assembly/Packing 5F: Warehouse
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not provided There was no legal requirement that the site must provide transport for workers.

← Site details

Worker analysis →

Work patterns

Approximate workers on site per month (% of peak)	**January**	80-90%	**February**	80-90%
	March	90-100%	**April**	90-100%
	May	90-100%	**June**	90-100%
	July	90-100%	**August**	90-100%
	September	90-100%	**October**	90-100%
	November	90-100%	**December**	90-100%

Is there any night 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 factory has not made relevant assessment.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No N/A

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	27 *(38%)*	44 *(62%)*	- -	71 *(100%)*

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	27 *(38%)*	44 *(62%)*	- -	71 *(100%)*
Temporary or fixed term employees	0 -	0 -	- -	0 *(0%)*
Agency or subcontracted workers	0 -	0 -	- -	0 *(0%)*
Seasonal workers	0 -	0 -	- -	0 *(0%)*
Self-employed workers	0 -	0 -	- -	0 *(0%)*
Informal workers including home workers	0 -	0 -	- -	0 *(0%)*
Apprentices, trainees or interns	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	15 *(62.5%)*	9 *(37.5%)*	- -	24 *(33.8%)*
International migrant workers	0 -	0 -	- -	0 *(0%)*
Total migrant workers	15 *(62.5%)*	9 *(37.5%)*	- -	24 *(33.8%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	Guangxi,Guizhou and Henan

Workers by age

	Men	Women	Other	Total
18 - 24 years old	4 *(33.3%)*	8 *(66.7%)*	- -	12 *(16.9%)*
15 - 17 years old	0 -	0 -	- -	0 *(0%)*
Under 15 years old	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

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 season.
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	38%	62%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 *(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 *(0%)*
Workers paid hourly / daily rate	27 *(38%)*	44 *(62%)*	- -	71 *(100%)*
Salaried workers	0 -	0 -	- -	0 *(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 *(0%)*
Paid weekly	0 -	0 -	- -	0 *(0%)*
Paid monthly	27 *(38%)*	44 *(62%)*	- -	71 *(100%)*
Other	0 -	0 -	- -	0 *(0%)*

* % of total workforce

If other payment cycle entered, please provide details	Nil

People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	1 *(50%)*	1 *(50%)*	- -	2
Supervisors or team leaders	2 *(33.3%)*	4 *(66.7%)*	- -	6
Administrative staff	4 *(19%)*	17 *(81%)*	- -	21

← Worker analysis

Worker interviews →

Worker interview summary

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

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	1 group of 5
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

← Worker analysis

Measuring workplace impact →

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?	Communication (e.g. from management) Overtime
Additional comments	As reported, the work condition in the facility was great, and workers could raise concerns or complaints to the worker representative directly or to the management through suggestion box/ Wechat. They were satisfied with timely payment of wages,a pleasant workplace, and cooperative management. In addition to these elements, the employees valued the chances for development and promotion inside the facility.The workplace offered consistent training programs and skill-development activities,enabling staff members to improve their professional talents and advance in their careers.
Attitude of workers' committee/union representatives	The worker representative was interviewed during the audit. He stated that he was elected by employees. During daily work, he collected the comments on the factory from employees. He provided the positive information on the factory to auditors during audit. No negative information.
Attitude of managers	The factory management was positive towards auditors. They provided relevant documents for review, showed auditors the production process during factory tour, and provided auditors an independent room for workers' interview. At the closing meeting, auditors provided the factory representative a general overview, and explained all findings to them. Meantime, auditors made the corrective suggestions corresponding to findings to the factory representatives. No negative information.

← Worker analysis

Measuring workplace impact →

Workers interviewed by type

	Total
Permanent workers	11
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	11

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	2	3	-	5
Workers interviewed individually	3	3	-	6

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	3	2	-	5
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	3	2	-	5

← Worker interviews

Measuring workplace impact →

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	1.0%	-	1.0%
Last full calendar year (2025)	1.0%	1.0%	-	2.0%
Previous full calendar year (2024)	2.0%	1.0%	-	3.0%

* 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%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

Are accidents recorded?	Yes There was no accident occurred in the past one year. The factory would conduct cause analysis, correction and prevention if work-related injury occurred.

← Worker interviews

Code area 0 →

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	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 (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	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 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

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

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

← Measuring workplace impact

Code area 0 →

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	System: 1.The factory management was cooperative and opening in the audit, all requested documents, interviewees and the facility itself are accessible, the auditor is provided with genuine and authentic records. 2.The factory did not offer bribes or threaten the auditor, nor in any way induce the auditor to be dishonest. 3.The factory provided an accurate site description and Sedex site profile declared prior to or during the audit. 4.The factory maintained a written human rights policy statement that was approved at the most senior level, communicated to all personnel, and trained to relevant personnel. 5.The facility has ensured accurate records are shown and audit has been conducted with full transparency and integrity. Evidence: 1.Sedex SAQ 2.Code of Conduct Evidence examined: 3.Appointment records 4.Complaint records. 5. ETI management manual

← Measuring workplace impact

Code area 1 →

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 any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 0

Code area 1.A →

Management systems

Explanation for management systems grades	The facility prohibited forced labour policy outlining the systems in place to manage this issue at the site. Further details could be found in the Employment Management Procedure, Prohibition Forced Labor Procedure, etc., these including relevant requirements of the code area. Although the facility has declared that employment meets regulatory requirements, including not using labor providers . However, there was no clear provision in the procedures regarding the potential risks that may arise if workers being placed in a situation of forced labour by labor providers or third parties. The facility had designated personnel from the administrative management department and human resources department to ensure the prohibition of forced labor, human trafficking, debt bondage, and other forms of modern slavery. Funded by the facility, these personnel receive professional training from external institutions to equip them with the capability to identify, detect, and address such violations.Meanwhile, workers were provided with multiple channels to report any employment related risks identified within the facility. The general manager and managers of each department received relevant social responsibility training, which included content on the prohibition of forced labor. They used this knowledge to develop effective procedural documents and to conduct training for facility workers. The facility did not conduct an overall evaluation of the training effectiveness of the previous year's training and regularly conduct training needs analysis to develop future training plans to adapt to changes in operating conditions. Additionally, the general manager strictly followed and monitored the execution of the procedure, ensuring that there were never any incidents of forced labor. The facility did not proactively conduct the survey and investigation for workers to ensure that no incident of forced labor occurred.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 0

Code area 1.A →

Systems and evidence examined to validate this code section	System: 1. The factory had a policy which prohibited forced labour and this was available for review. 2. There was a non-formalised application procedure which stated that workers must present their IDs for proof of age but that only copies must be kept in the personnel files and the original given back to the workers. 3. The employee handbook - given to all workers on joining, stated that workers within their probation period were free to leave with 3 days written notice and once a worker was permanent (this was out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also stated that they would be given their full wages on their last day of work. 4. The terms and conditions of employment in the handbook stated that the workers were free to leave the workplace outside of their working hours. 5. Contract for security guards stated that they must not prevent workers from leaving the premises outside of working hours and where they were conducting searches that this was at the request of management, was done on a sample basis and was performed discretely and without significant delay to workers leaving at the end of shift. 6. The above was confirmed in management and worker interview. Evidence: 1. Social accountability policy and manual 2. Personnel files and labour contracts 3. Resignation records 4. Interview with management and workers 5. Site tour

← Code area 0

Code area 1.A →

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

← Code area 1

Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	The facility's recruitment procedures outlining the systems in place to manage this issue at the site. Further details could be found in the Employment Management Procedure, Anti-discrimination Procedure, Supplier Management Procedure, etc., these including relevant requirements of the code area. Although the facility has declared that recruitment meets regulatory requirements. However, there was no clear provision in the procedures regarding the potential risks that may arise if labor providers or on-site subcontractors involed issues related to recruitment fees or related costs. The facility designated personnel from the human resources department to ensure compliance with lawful recruitment practices and protect workers' legal employment rights. This process was overseen by the HR manager, with the company funding external professional training for these personnel to equip them with the ability to identify, detect, and address such violations. Additionally, workers were provided with multiple channels to report any employment-related risks within the facility.However,there was no effective tool to verify identities, and it was solely based on visual inspection. The general manager and managers of each department received relevant social responsibility training, including recruitment related content such as identity verification, no deposits, no fees, etc. They used this knowledge to develop effective procedural documents and to conduct training for facility workers. Additionally, the general manager strictly followed and monitored the execution of the procedure, and there was no case where employees were required to pay additional fee. The facility did not proactively conduct the survey and investigation for workers to ensure that no incident of deposit, additional fee, etc. occurred.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 1

Code area 2 →

Systems and evidence examined to validate this code section	System: All employees were Chinese. As per the provided labour contracts, all employees were hired directly by the factory, no temporary labour was found in the facility and no labour provider or on-site subcontractor was used in the factory. As per the factory management documents review, worker interview and factory tour, there was no labour provider or on-site subcontractor used by factory currently, and if the factory need labour provider or on-site subcontractor, they would sign service agreement with them, the service agreement including following items: • Hold labour provider or on-site subcontractor responsible for ensuring no recruitment fees or related costs are incurred or charged to workers. • Hold labour providers or on-site subcontractors responsible for ensuring no recruitment fees or related costs are paid. • If the workers who are found to pay recruitment fees or related costs (legal or otherwise, as defined by the ILO and including travel and visa costs), the facility would fully reimbursed in a timely manner. Therefore, no issue was detected regarding this section. Evidence: 1 Hiring procedure 2Personnel files and labour contracts 3 Employee handbook 4Employee roster 5Worker interview and management interview

← Code area 1

Code area 2 →

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 (excluding 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

← Code area 1.A

Code area 2 →

Percentage of workers that are migrant	34%
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	Guangxi,Guizhou and Henan

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid?	No - new workers paid recruitment costs but these have been fully repaid by the site
Select 1 to 3 sending countries/regions of new workers. Record fees and costs in the following tables.	China

New workers totals

	China
Number of workers	39

Recruitment fees

	China
Payments made in exchange for work	-
Recruitment services which are not optional	-

← Code area 1.A

Code area 2 →

Recruitment fees

Other or uncategorised	✓

Related costs

	China
Medical costs	✓
Insurance costs	-
Skills and qualification tests	-
Training and orientation	-
Equipment costs	-
Travel costs	✓
Accommodation costs	✓
Administrative costs	-
Other or uncategorised	-

Illegitimate costs

	China
Payments made to illegitimate actors involved in the recruitment process	-

← Code area 1.A

Code area 2 →

Illegitimate costs

Payments made to illegitimate actors during the course of employment	-
Other or uncategorised	-

Was any worker in this group in debt as a result of these costs?

	China
Yes - to a recruiter	-
Yes - to the audited site	-
Yes - to a third party	-
No - could not verify	✓

Highest total costs incurred

	China
Currency	CNY
Highest total costs incurred	1200.0
Additional comments	The management stated that the cost of recruiting new employees mainly consisted of pre employment medical examination expenses,employee travel expenses and hotel accommodation expenses,which were reimbursed by the factory.The worker interviewed stated that the factory had already reimbursed the medical examination expenses,travel expenses and hotel accommodation expenses.Additionally,the workers stated that there were no other unreasonable expenses.

← Code area 1.A

Code area 2 →

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	Some Improvements Recommended
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

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	The facility's freedom of association and collective bargaining policy and Procedure outlining the systems in place to manage this issue at the site. Further details could be found in the Employment Management Procedure, Employee Representative Election Procedure, Employees' Freedom of Association Procedure, etc., these including relevant requirements of the code area. Although the facility has declared that they will respect employees' right to collective bargaining. However, these documents does not fully reflect the needs from employees of different positions, ages and backgrounds. The facility had designated a specific person to oversee compliance with freedom of association and collective bargaining, and to assist workers in organizing activities when necessary. At the same time, worker representatives were able to engage with employees at any time and held quarterly meetings with management to provide feedback and suggestions based on employees' opinions. The general manager and managers of each department received relevant social responsibility training, including collective bargaining and freedom of association.They used this knowledge to develop effective procedural documents and to conduct training for facility workers. But some workers did not care about the information posted on the bulletin board. Additionally, the general manager strictly followed and monitored the execution of the procedure, and workers were free to elect worker representatives, who could hold meetings and communicate with workers as necessary. According to the worker suggestion or grievance records provided by the facility, workers were less willing to provide suggestion or grievance. The facility should implement more effective promotion methods to encourage more employees to actively share their ideas.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
2. Freedom of association and right to collective bargaining are respected	2.D Give appropriate time and space for worke...	Base code	NC ZAF601700360

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	System: 1. The factory 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. 2. There was no union in the factory. 3. The worker representative normally would have a meeting with management on a trimonthly basis to summarize the concerns and complaints from production workers. 4. All interviewed workers stated that they could report their concerns to the worker representative or directly to the supervisor or upper management. 5. In addition, workers could also response their concerns through suggestion box. And all complaints or suggestions would be tackled within a short time. 6. No CBA was established in this factory. Workers were freely to attend the employee representative/ management representative meetings. Evidence: 1. Policy on freedom of association and right to collective bargaining 2. Social accountability manual included worker representative selection program and the responsibility of the worker representative 3. Interview with workers 4. Interview with management

← Code area 1.A

Code area 3 →

Findings: non-compliances

ZAF601700360

Non-compliance

Due 2027-01-17

Code area

2 Freedom of association and right to collective bargaining are respected

Workplace requirement

2.D Give appropriate time and space for worker representatives to operate. Ensure all workers are aware of who their representative is, their activities and how they can engage with them.

Issue title

137 - A committee exists but workers do not know about the worker committee, its function and/or who their representatives are

Description

The minutes of the employee representative meeting were not posted. During the audit, it was found that the meeting minutes between employee representatives and management were not posted on the bulletin board.员工代表会议记录没有张贴。审核中发现，员工代表与管理层的会议记录没有张贴在公告栏。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the factory post the meeting minutes of the eight employee representatives and management on the bulletin board.建议企业把员工代表与管理层的会议记录张贴在公告栏。

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Base code

* PDF generated at 15:52 (UTC) on 18 Nov 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 2

Code area 3 →

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 there alternative worker representative bodies in place?	Yes, other (provide details) worker representative
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable

← Code area 2

Code area 3 →

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

← Code area 2

Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 2

Code area 4 →

Management systems

Explanation for management systems grades	The facility's health and safety policy outlining the systems in place to manage this issue at the site. Further details could be found in the EHS Management Procedure, Emergency Preparedness and Response Management Procedure, Risk Identification and Assessment Procedure, etc., these including relevant requirements of the code area. Although the facility has declared to ensure that employees have a safe working environment. However, the facility did not regularly evaluate the procedures and policies in use so there was a risk that the procedures and policies were not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. The facility had appointed qualified safety personnel to manage health and safety in the facility. They assessed the risks in the workplace and developed and implemented corresponding safety measures. New employees were required to attend on-boarding training from the management which included facility safety and health policy. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone, but refresher courses are not as frequent as they should be. Some new safety regulations or best practices may not be communicated to all employees in a timely manner. The factory conducted regular internal audits and risk assessments to ensure workplace safety. Accident reports and logs were maintained and analyzed to identify preventive measures. Corrective actions were implemented based on safety inspections and worker feedback. The Health and Safety Committee actively monitored workplace conditions and reported risks to management. An annual management review was conducted to evaluate the effectiveness of the health and safety management system. However, there was insufficient supervision of workplace safety resulted in that inadequate occupational disease health monitoring for employees .

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 2

Code area 4 →

3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law	NC	ZAF601700356
	3.H Where identified as necessary to reduce r...	Local law	NC	ZAF601700358
	3.O Implement an appropriate electrical safet...	Local law	NC	ZAF601700357
	3.R Provide clean and secure toilets, wash ar...	Local law	NC	ZAF601700361

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	System: 1. General Health and Safety management (1) Health & Safety policy was established in the factory and the factory manager was familiar with it. (2) Safety director was appointed to be responsible for the facility's safety and health conditions. (3) Purified water was provided free of charge to workers, the drinking water test report was up-to-date and kept in the factory and the test result was qualified. (4) Lavatory facilities were accessible and adequate in number, private and segregated for men and women. (5) Ventilation, temperature and lighting were adequate for the production processes. (6) Some workers were properly wearing PPE (Personal Protective Equipment) in the production workshop. (7) Occupational hazards factors testing was conducted, and the report was provided for review. (8) 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 (1) There were at least 2 exits from each work area and these were clearly marked. (2) Fire fighting equipment were adequate, and checks were up-to-date. (3) Evacuation diagrams were posted in all areas and understood by all workers interviewed. (4) Fire drills were organised and recorded every 6 months for production units. (5) Trainings had been given to all employees. 3. Electrical safety (1) There was 1 competent electrician at the site and the certificate was available for review. 4. Medical services (1) There were adequate first aid kits in each production area and they were well stocked. (2) There were 2 trained first aiders on site. 5.Machine safety (1) Operation: Established equipment safety operation rules, demarcated exclusive operating areas, strictly controlled equipment operation access, and prohibited any unsafe operating practices. 6.Chemical safety (1)Based on onsite observation, the main chemicals used in the factory were glue and etc. (2)The factory provided second containers for chemicals. Evidence: 1. Health and safety policy 2. Health and safety manual

← Code area 2

Code area 4 →

3. Health and safety committee minutes
4. Training records and certificates
5. Government licenses
6. Special equipment inspection reports and qualified operator certificates
7. Fire equipment maintenance records
8. Fire drill and evacuation records
9. Building structure safety certificate
10. Fire safety certificate
11. First aider certificate
12. Checks on fire equipment
13. Accident report
14. Electrician certificate
15. Potable water testing report
16. Interview with H&S manager and committee members
17. Interview with workers
18. Site tour

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601700356

Non-compliance

Due 2027-01-17

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

318 - Inadequate/isolated failure in conducting medical examinations or 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 of pre-job.
During document review, it was noted that the factory did not arrange pre-job occupational health examination for employees.
未安排岗前的职业病体检。
审核中发现，企业没有安排员工进行岗前的职业病体检。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the factory shall conduct occupational health examination for those laborers who start to work with noxious articles or leave the noxious post.
建议企业应提供岗前和离岗的职业健康检查给接触职业危害工序的员工。

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

In accordance with 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.

* PDF generated at 15:52 (UTC) on 18 Nov 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601700358

Non-compliance

Due 2026-12-18

Code area	Status
3 Working conditions are safe and hygienic	Open*

← Code area 3

Code area 4 →

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

Unsuitable type of PPE (Personal Protective Equipment).
During factory tour, it was noted that 2 employees in polishing workshop were wearing medical masks instead of dust masks.
劳动防护用品类型不对。
审核中发现，企业抛光车间2名员工佩戴的口罩为医用口罩，而不是防尘口罩。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that factory should supervise employees to use the correct personal protective equipment.
建议企业应监督员工使用正确的劳保用品。

Local law reference

In accordance with 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



Unsuitable type of PPE.jpg

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

* PDF generated at 15:52 (UTC) on 18 Nov 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

ZAF601700357

Non-compliance

Due 2026-12-18

Code area

3 Working conditions are safe and hygienic

Workplace requirement

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

Issue title

227 - Unmarked/incorrect labels/signage/instructions for electrics

Description

Warning sign was not posted on electricity box.
During factory tour, it was noted that 1 electricity box was not posted with warning sign in cutting workshop of 1F.
电箱未张贴警示标识。
审核中发现，企业一楼开料车间有1个电箱没有张贴警示标识。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the factory should marked with appropriate warning signs on electricity boxes to avoid electric shock.
建议工厂应在电箱上张贴警示标志以防触电。

Local law reference

In accordance with Article 2-7 of warning sign in the Guidelines for safety signs and usage GB 2894-2008, the electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen.

Evidence

Status

Open*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →



Warning sign was not posted on electricity box..jpg

* PDF generated at 15:52 (UTC) on 18 Nov 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601700361

Non-compliance

Due 2027-01-17

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.R Provide clean and secure toilets, wash areas, and worker changing facilities, with adequate hygiene supplies separated by gender or with effective privacy. Ensure potable water is easily accessible by workers and, where appropriate, clean storage facilities for food and personal belongings.

Issue title

327 - Storage of goods not in line with legal requirements (e.g. too high)

Description

No gap between the wall and the stack.
During facility tour, it was noted that the production materials were stored against wall and beams in the finished goods warehouse.
货物与墙、垛无安全距离。
审核员发现成品仓库货物靠墙、靠柱堆放。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that facility should keep safe distance for the stacks and walls and between stacks and beams.
建议企业应该保持垛与垛，垛与墙之间的安全距离。

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 3

Code area 4 →

Local law reference

In accordance with Rules for Warehouse Fire Prevention Safety Management Article 18, the goods in warehouse should be classified for storage. The area occupied by any single stack should not be greater than 100 square meters. Space shall be at least 1 meter between stacks; Space shall be at least 0.5 meter between stacks and the wall; Space shall be at least 0.3 meter between stacks and beams or posts. The width of main passages shall be at least 2 meters.

Evidence



No gap between the wall and the stack..jpg

* PDF generated at 15:52 (UTC) on 18 Nov 2026. View this finding on the Sedex platform for live updates and closure details.

← Code area 3

Code area 4 →

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 glue and 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 addition was found during audit.
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

← Code area 3

Code area 4 →

Does the site have a structural engineer evaluation?	Yes

← Code area 3

Code area 4 →

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 3

Code area 5 →

Management systems

Explanation for management systems grades	The facility's prohibiting child labor policy outlining the systems in place to manage this issue at the site. Further details could be found in the Employment Management Procedure, Prohibition of Child Labor Policy, Risk Assessment Procedure for Young Workers, Young Worker Control Procedure, etc., these including relevant requirements of the code area. Although the facility has declared that facilities prohibit the use of child labor. However, the facility did not regularly evaluate the procedures and policies in use so there was a risk that the procedures and policies were not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. The general manager was responsible for implementation and was aware of his responsibilities. Personnel specialist oversees age verification and child labour prevention, and maintains detailed age verification records for all workers. The general manager and managers of each department received relevant social responsibility training, including Prohibit child labor and protect juvenile workers. They used this knowledge to develop effective procedural documents and to conduct training for facility workers. During worker interview, some workers were not fully aware of child labour policies. Additionally, the general manager strictly followed and monitored the execution of the procedure to ensure that child labor was not recruited and that special protection was given to underage workers. The facility currently lacked plans and procedures for conducting surprise checks on the identity and age of employed employees.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 3

Code area 5 →

Systems and evidence examined to validate this code section	System: 1. There was a written policy in regard to prohibition of child labour, which stipulated that no worker under 16 years old would be recruited in the factory. 2. To prevent hiring child labour, the factory also established age verification mechanism. The HR staffs would authenticate ID card of candidates via physical appearance comparison, questions testing and ID card authentication facility. All these processes ensured no fake ID card was used by potential worker during the hiring process. 3. According to review of employees' personal files and employee interview, there was no child labour in the factory. 4. Through reviewing employees' personnel files and whole factory tour, there was no employee that was under 18 years. 5. Further details could be found in the "Child Labor Remediation and Juvenile Workers Protection Procedures". 6.They had child labour remediation policies and procedures. Once child labor was found, child labor must be stopped immediately, but child labor must not be dismissed immediately, and child labor protection should be taken immediate measures and notify local government departments in time. Child labor remediation policies and procedures included the following contents: 1. Immediately terminated work, left the workplace, contacted a legal guardian, and arranged free and safe accommodation; 2. Arranged health checks for the child with the consent of the child and his/her family; 3. Terminated labor relations and settled labor remuneration; 4. Payment of child subsistence allowance until the age of 16; 5. Arranged them to study until the age of 16, and the cost shall be borne by the facility; 6. If the child worker himself wished to continue working in the facility, the facility shall offered him the opportunity after his sixteenth birthday; 7. Kept all the above documents and records. Evidence: 1. The recruitment policy on child labour was reviewed. It stated that the factory would never employ or use any child labour under the age of 16 years old. 2. Recruitment procedure 3. Latest employee list 4. Personnel files of all workers 5. Interview with management and workers 6. Site tour

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	16%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	23
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	0.0%
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

← Code area 4

Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 4

Code area 5.A →

Management systems

Explanation for management systems grades	The facility's wages and benefits policy and procedure outlining the systems in place to manage this issue at the site. Further details could be found in the Employee Handbook, Salary and Welfare Scheme, etc.. These documents cover employee benefits, statutory holidays, wage calculation methods, and other issues. Although the facility has declared that they ensured workers receive corresponding benefits (e.g. full attendance award, job allowance, high-temperature subsidy, etc.). However, these procedures and policies does not clearly specify the standards for benefit. The factory appointed the Administrative & HR Manager for calculation and payment of workers' wages and overtime pay, payment of social insurance for workers, and protection of workers' right to take leave. The Administrative & HR Manager had been working in the factory for many years. However, the Administrative & HR Manager did not have a certificate in human resource management and was not familiar with the Modern Slavery Act 2015, Proposal for a regulation of the European Parliament and of the Council on prohibiting products made with forced labour on the Union market,corporate sustainability due diligence directive etc. It is recommended to include the entire HR team in the responsibility of monitoring and handling wage complaints from workers and they were aware of their responsibilities. New employees were required to attend on-boarding training from the Administrative & HR department which included salary and benefits management procedure.According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone, including salary and benefits management procedure. The factory did not provide further communication or training for these workers and social insurance policy was not displayed on the announcement board. According to factory management interview, the factory management was actively communicating with workers about the benefits of participating in social insurance and the requirements of the local government that workers must participate in social insurance. However, it's recommended that the factory included workers' interview in the monitoring process. Although interviewed workers confirmed that they had attended these training, some of them were unwilling to participate in work-related injury insurance.

Summary of findings

← Code area 4

Code area 5.A →

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601700359

Systems and evidence examined to validate this code section

System:
1. All employees' wages were calculated on an hourly basis and paid by bank transfer before 30th each month for the last 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.
2. During this audit, the payroll records from October 2025 to September 2026 (current month) and attendance records from 1 October 2025 to 11 November 2026 were provided for review. As per review of 10 sampled employees' payrolls and attendance records from November 2025,March 2026 and September 2026 (current month), it was noted that all workers were paid at least RMB20.11 per hour (RMB3500 per month) which was above the legal minimum wage.
3. 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.
4. Paid annual leave benefit was also entitled to the employees who worked more than one year in the factory according to legal law.
5.Insufficient social insurance participated. According to the social insurance payment receipt provided by factory management in October 2026, there were 100 employees in the factory, excluding 8 retired employees and 5 new employees, all eligible employees had participated in basic retirement insurance, unemployment insurance, disability caused by work-related injury insurance, medical insurance and maternity insurance. And there were only 87 out of 100 eligible employees (87%) had participated in disability caused by work-related injury insurance.Remark: The factory had bought the commercial injury insurance to 25 employees. (valid from 17 June 2026 to 16 June 2027).
Evidence:
1. Wages and benefits policy and procedure
2. Local and national laws
3. Local legal min wage documents
4. Labour contracts for all workers
5. Resignation records
6. Production records
7. Social security insurance payment receipts
8. Worker interview and management interview

← Code area 4

Code area 5.A →

Findings: non-compliances

ZAF601700359

Non-compliance

Due 2027-01-17

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

Insufficient social insurance participated. According to the social insurance payment receipt provided by factory management in October 2026, there were 100 employees in the factory, excluding 8 retired employees and 5 new employees, all eligible employees had participated in basic retirement insurance, unemployment insurance, disability caused by work-related injury insurance, medical insurance and maternity insurance. And there were only 87 out of 100 eligible employees (87%) had participated in disability caused by work-related injury insurance.Remark: The factory had bought the commercial injury insurance to 25 employees. (valid from 17 June 2026 to 16 June 2027). 社会保险参保不足。 根据提供的2026年10月份社保收据，企业的100名员工中，除去8名退休员工和5名新员工，所有应参保员工都参加了养老、失业、医疗保险和生育保险；100名应参保员工中仅有87人（87%）参加了工伤保险。备注：工厂为25名员工购买了商业意外伤害保险。有效期为2026年6月17日至2027年6月16日。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the facility shall ensure all employees participate in 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。

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 4

Code area 5.A →

Local law reference

PRC Labor Law article 72, employing unit and employees must participate in social insurance and pay social insurance premiums in accordance with 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 in accordance with 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 in accordance with 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 in accordance with the relevant provisions of the state.
Article 15 of the "Interim Provisions on the Protection of Basic Rights and Interests of Over-Age Workers" explicitly stipulates that employers shall enroll workers who have exceeded the statutory retirement age in work-related injury insurance and pay the corresponding premiums, with no contribution required from the individuals themselves.

Evidence



Insufficient social insurance participated..jpg

* PDF generated at 15:52 (UTC) on 18 Nov 2026. 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?	Wages meet a living wage Other (provide details) The legal minimum wage All workers were paid at least RMB20.11 per hour (RMB3500 per month) which was above 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
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Anker Reference Value Methodology

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

← Code area 5

Code area 5.A →

Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	40.0
	Required hours per month	184.0
Maximum legal overtime hours	**Max hours per day**	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	14.0
	Max hours per month	60.0
Minimum legal wage	**Min per hour**	11.72
	Min per day	93.8
	Min per week	468.97
	Min per month	2040.0
Actual minimum wage	**Actual per hour**	20.11
	Actual per day	160.92
	Actual per week	804.6
	Actual per month	3500.0

← Code area 5

Code area 5.A →

Minimum legal overtime wage	**Min per hour**	17.58
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	30.17
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 workers sample from November 2025, 10 workers sample from March 2026, 10 workers sample from September 2026.
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning above the minimum wage.
Are there any bonus schemes used?	No

← Code area 5

Code area 5.A →

Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5

Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	System: 1. The calculation method is one of the six benchmarks and aligns with the ILO's ten principles. The site used Anker's methodology to calculate the living wage. The facility established wages and benefits policy and procedure, which ensured all employees' minimum wage exceeded the legal requirement. 2. The factory uses the Anker reference value method to calculate the living wage,composed of the total number of family members, children's education expenses, living costs, energy expenses, medical expenses, transportation expenses, etc. The per capita living wage in the region is calculated to be 3124RMB. The actual minimum wage of the factory was RMB3500/month which was higher than the living wage. 3. The facility had a wage improvement plan which was included all key elements. 4. There was an annual review when local wage rates were examined. Evidence: 1. Wages and benefits policy and procedure 2. Statistical table of minimum living wage for workers 3. Workers' payroll record 4. Worker interview and management interview

← Code area 5

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	The facility's working hours policy and procedure outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Further details could be found in the Employee Handbook, Working Hours Control Management Procedure, etc.. These documents cover employee's normal working hours, overtime hours, rest time and other issues. Although the facility has declared that they ensure working hours do not exceed 60 hours in a standard working week for any worker. However, these procedure and policies does not fully specify the appropriate safeguard measures to be taken to protect the workers' health and safety in the event of unexpected production peaks, accidents or emergencies. The factory appointed an Administrative & HR Manager responsible for managing workers' working hours, including checking attendance records on a monthly basis. The Administrative & HR Manager had been working in the factory for many years. However, the Administrative & HR Manager did not have a certificate in human resource management and was not familiar with the Modern Slavery Act 2015, Proposal for a regulation of the European Parliament and of the Council on prohibiting products made with forced labour on the Union market, corporate sustainability due diligence directive etc. However, the job description for the HR team did not have these responsibilities. Although the Administrative & HR Manager had repeatedly suggested in management meetings that workers should work overtime in accordance with local laws and regulations, the overtime situation was not improved due to the factory General Manager's prioritization of completing production tasks. New employees were required to attend on-boarding training from the Administrative & HR department which included hour control management procedure. According to factory management and workers interview, the factory also held an annual training on factory procedure documents for everyone, including work hour control management procedure. However, it was very common for workers to work overtime and not realize the importance of complying with national labor laws. However, it's recommended to communicate the policy to all the workers through posting it on the announcement board. The factory did not realize the risk of violating laws and regulations in order to provide products to customers on time. The Administrative & HR Manager was responsible for monitoring attendance records and overtime hours on a monthly basis. The factory had an accurate electronic attendance system to record workers' attendance. The Administrative & HR Manager could access workers' attendance data by operating the attendance machine. If workers had questions about their attendance, they could check the attendance data accompanied by the Administrative & HR Manager. While positive, it's recommended to conduct a regular meeting with the workers to get their feedback. However, some

← Code area 5.A

Code area 7 →

Management systems

	sampled workers' overtime hours exceeded 36 hours per month, which did not meet the local legal requirement.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law Base code	NC ZAF601687109

Systems and evidence examined to validate this code section	System: 1. Through employee interview, employees were voluntary to work overtime. 2. The factory adopted face and fingerprint scanning system to record working hours for all employees. 3. Normally employees worked for 5 days a week . It was from 08:00 to 20:00 with 2-hour break time and 2-hour overtime. 4. There was no obvious peak month in the factory. 5. During this audit, the payroll records from October 2025 to September 2026 (current month) and attendance records from 1 October 2025 to 11 November 2026 were provided for review. As per review of 10 sampled employees' payrolls and attendance records from November 2025,March 2026 and September 2026 (current month), it was noted that the maximum daily overtime hours, weekly total working hours and consecutively working days for all sample population employees were 2 hours per workday, 54 hours per week and 6 days respectively. Evidence: 1. Facility policy on working hours 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

← Code area 5.A

Code area 7 →

Findings: non-compliances

ZAF601687109

Non-compliance

Due 2022-12-28

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 (maximum 36 overtime hours per month). During document review, it was noted that sampled employees worked in excess of the statutory overtime hour limits. A review of attendance records for November 2025, March 2026 and September 2026 yielded the following: (1) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 60 hours) in November 2025. (2) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 54 hours) in March 2026. (Remark:Note: The sampled employees' overtime hours in September 2026 amounted to 36 hours, which complies with legal regulations.)月加班时间超过法规要求（最高每月36小时）。 审核发现，抽样的员工加班时间超过了法定标准，抽样2025年11月、2026年3月和2026年9月的考勤发现：
（1）10/10名抽样员工的2025年11月加班时间超过了每月法定的36小时标准，最高为60小时。
（2）10/10名抽样员工的2026年3月加班时间超过了每月法定的36小时标准，最高为54小时。 （备注：抽样员工2026年9月加班时间为36小时，符合法律规定。）

Status

Open*

Time given to resolve

60 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 6

Code area 7 →

Description (carried over)

Monthly overtime hours exceeded the legal requirement (maximum 36 overtime hours per month). During document review, it was noted that sampled employees worked in excess of the statutory overtime hour limits. A review of attendance records for December 2024, March 2025 and September 2025 yielded the following: (1) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 76 hours) in December 2024. (2) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 82 hours) in March 2025. (3) 10 out of 10 sampled employees in excess of 36 overtime hours per month (i.e. maximum 76 hours) in September 2025. 月加班时间超过法规要求（最高每月36小时）。 审核发现，抽样的员工加班时间超过了法定标准，抽样2024年12月、2025年3月和2025年9月的考勤发现： （1）10/10名抽样员工的2024年12月加班时间超过了每月法定的36小时标准，最高为76小时。 （2）10/10名抽样员工的2025年3月加班时间超过了每月法定的36小时标准，最高为82小时。（3）10/10名抽样员工的2025年9月加班时间超过了每月法定的36小时标准，最高为76小时。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。

Intended corrective and preventative actions, based on root cause analysis (carried over)

It is recommended that factory management adopt practices and controls to ensure that employee overtime hours do not exceed the statutory limits. 建议工厂确保员工的加班时间符合法律要求。

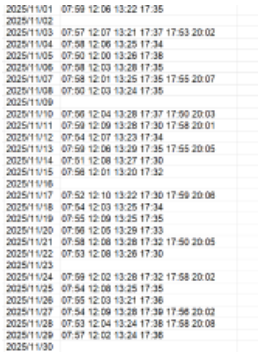
Local law reference

In accordance with Article 41 of the Labor Law of the PRC, after consultation with the trade union and employees, the employer may extend working hours due to its production or business needs, but the extended working hours shall not generally exceed one hour a day; in special circumstances that require an extension of working hours, the extended working hours shall not exceed 3 hours a day and 36 hours a month on condition that the health of employees is guaranteed. 根据《中华人民共和国劳动法》第41条：用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。

Evidence

← Code area 6

Code area 7 →



2025/11/01	07:59	12:06	13:22	17:35			
2025/11/02							
2025/11/03	07:57	12:07	13:21	17:37	17:53	20:02	
2025/11/04	07:58	12:06	13:25	17:34			
2025/11/05	07:50	12:00	13:26	17:36			
2025/11/06	07:58	12:03	13:28	17:35			
2025/11/07	07:58	12:01	13:25	17:35	17:55	20:07	
2025/11/08	07:50	12:03	13:24	17:35			
2025/11/09							
2025/11/10	07:56	12:04	13:28	17:37	17:50	20:03	
2025/11/11	07:59	12:09	13:28	17:30	17:58	20:01	
2025/11/12	07:54	12:07	13:23	17:34			
2025/11/13	07:59	12:06	13:29	17:35	17:55	20:05	
2025/11/14	07:51	12:08	13:27	17:30			
2025/11/15	07:58	12:01	13:20	17:32			
2025/11/16							
2025/11/17	07:52	12:10	13:22	17:30	17:59	20:06	
2025/11/18	07:54	12:03	13:25	17:34			
2025/11/19	07:55	12:09	13:25	17:35			
2025/11/20	07:56	12:05	13:29	17:33			
2025/11/21	07:58	12:08	13:28	17:32	17:50	20:05	
2025/11/22	07:53	12:08	13:26	17:30			
2025/11/23							
2025/11/24	07:59	12:02	13:28	17:32	17:58	20:02	
2025/11/25	07:54	12:08	13:25	17:35			
2025/11/26	07:55	12:03	13:21	17:36			
2025/11/27	07:54	12:09	13:28	17:39	17:56	20:02	
2025/11/28	07:53	12:04	13:24	17:38	17:58	20:08	
2025/11/29	07:57	12:02	13:24	17:36			
2025/11/30							

Monthly overtime hours exceeded the legal requirement.png

* PDF generated at 15:52 (UTC) on 18 Nov 2026. 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
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	52.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

← Code area 6

Code area 7 →

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	Some Improvements Recommended

← Code area 6

Code area 8 →

Management systems

Explanation for management systems grades	The facility's anti-discrimination policy and procedure outlining the systems in place to manage this issue at the site. Further details could be found in the Employee Handbook, Employment Management Procedure, Anti-discrimination Procedure, Prohibition Physical Punishment and Abuse Control Procedure, etc., these including relevant requirements of the code area. The facility promised to equity approach in recruitment,training, development and promotion processes, and adopted some specific measures. For example,it has been clearly stated that employees can be recruited through diversified recruitment channels; when formulating training plans, fully consider the different backgrounds, skill levels, and learning needs of employees;make efforts to understand the career development expectations and needs of different employees and provide them with sufficient attention and support;provide feedback and guidance to employees who have been promoted, helping them understand their own shortcomings and clarify their future development directions. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. It also provided a letter of appointment for Manager to be in charge of the human rights content of the facility. The manager was responsible for implementation but not aware of his responsibilities, and had been working in the facility for many years but didn't have a good understanding of the policy content and the situation of the facility. All management and supervisors received relevant social responsibility training, including anti-discrimination policy and no worker was required to do the examination of the Hepatitis B and HIV. The manager used this knowledge to develop effective procedural documents, and also held training on facility procedure documents for everyone. After the training, the facility conduct an assessment of the training's effectiveness and regularly conduct training needs analysis to develop future training plans to adapt to changes in operating conditions.The facility has no effective complaints and complaint channels to obtain employees' suggestions and opinions in this regard. Adherence to the processes was monitored through departmental reporting to Manager, and there was no mechanism to monitor whether the procedures were implemented by employees. The manager followed and monitored the execution of the procedure, and there were no cases of discrimination occurred in the facility. But supervisor did not proactively conduct the survey and investigation for workers to understand hidden discrimination risks in the facility.

← Code area 6

Code area 8 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

No findings

← Code area 6

Code area 8 →

Systems and evidence examined to validate this code section	System: 1. As informed by interviewed employees, most employees spoke highly of the facility owner. 2. 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. 3. 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. 4. There was an internal grievance process. All sampled employees were aware of the grievance channels in case they encountered any discrimination cases. 5. There was no evidence of sexual harassment. 6. The facility had a gender equity policy, which included recruitment, training, promotion and development, emphasizing gender equality. The written policies and procedures on gender equality programs and an independent gender equality action plan ensured that employees were not discriminated against based on gender and provide equal opportunities for employees of all genders. All sampled employees were aware of the gender equity policy. 7. The facility had a comprehensive equity approach, including: a. Policies and procedures on gender equity and other non-discrimination aspects (e.g., race, caste, national origin, religion, age, disability, marital status, sexual orientation, union membership, political affiliation). b. A standalone equity and inclusion action plan, not limited to gender. c. Policies or activities addressing barriers related to gender and other protected characteristics. d. On-site initiatives promoting gender and diversity equity. e. Partnerships with independent third parties (e.g., NGOs) focusing on equity, diversity and inclusion. f. The equity approach was covered in recruitment, training, development and promotion processes, ensuring fair opportunities for all workers regardless of gender, race, religion, age, disability, marital status, sexual orientation, union membership or political affiliation. 8. The facility had identified the categories and compiled a roster of employees who are in need of special support. 9. To implement equity policies, the facility adopted various measures based on employees' needs and actual circumstances, such as offering flexible working hours for female employees, setting up accessible restrooms for disabled employees who use wheelchairs, and provide necessary assistive equipment (such as automatic thread trimmers, high-brightness LED lights, etc.) for older employees and those with declining physical functions. 10.There are currently no specific groups of employees in the factory, such as underage workers, disabled workers, etc. and the factory has established a blank list

← Code area 6

Code area 8 →

for special groups.
Evidence:
1. Anti-discrimination policy and social accountability manual.
2. The hiring and termination procedure, leave application records and employee handbook.
3. Gender equity policy.
4. Attendance records.
5. Training records.
6. Termination records.
7. Interview with management and workers.

← Code area 6

Code area 8 →

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)	2%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	9%
Three most common nationalities in managerial and supervisory roles	Chinese

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	The facility's recruitment policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Further details could be found in the Employee Handbook, Employment Management Procedure, etc., these including relevant requirements of the code area. Although the facility has declared compliance with relevant regulations. However, the facility did not regularly evaluate the procedures and policies in use so there was a risk that the procedure and policy was not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes. The general manager was responsible for implementation and was aware of his responsibilities.The HR department assigned a dedicated person to manage the labor contracts. There was a special mechanism to ensure that the labor contracts were within the validity range. The general manager and managers of each department received relevant social responsibility training, including regular employment. They used this knowledge to develop effective procedural documents and to conduct training for facility workers.However, some employees interviewed were not clear about the specific contents of labor contracts, and they did not pay special attention to whether the signed contracts met the requirements of regulations. The general manager strictly followed and monitored the execution of the procedure to ensure regular employment was provided to workers.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 7

Code area 8.A →

Systems and evidence examined to validate this code section	System: 1. All workers were recruited by the factory directly and had properly signed contracts with the factory. 2. No labour agency was used to hire worker. 3. No temporary worker or home worker was identified by auditor. 4. 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. 5. Additionally, all of the workers were properly provided with one copy of the labour contract for his or her reference. Evidence: 1. Recruitment policy 2. The hiring and termination practices 3. Personal files and labour contracts 4. Interview with management interview and workers

← Code area 7

Code area 8.A →

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%

← Code area 8

Code area 8.A →

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 8

Code area 9 →

Management systems

Explanation for management systems grades	The facility's subcontractor and homeworkers management procedures outlining the systems in place to manage this issue at the site. Further details could be found in the Employment Management Procedure, Supplier Management Procedure, etc., these including relevant requirements of the code area. Although the facility has declared that it has not used sub-contractors or homeworkers, and complies with the customer's relevant requirements. However, the facility did not regularly evaluate the procedures and policies in use so there was a risk that the procedure and policy was not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. The general manager was responsible for implementation and was aware of his responsibilities. The facility designated personnel responsible for implementing and overseeing the prohibition of homeworkers and unauthorized subcontracting within its operations, while also monitoring suppliers and subcontractors for any use of homeworkers or unauthorized subcontracting. Regular audits were conducted on the facility's internal practices, subcontractors, and suppliers to ensure compliance with ethical standards related to wages, working hours, and worker safety. The manager received relevant social responsibility training, including use subcontractor requirements and homeworkers. And the facility had established a list of approval suppliers and subcontractors. The facility assessed its suppliers and subcontractor on social accountability, and relevant assessment records were available. The content of the evaluation covers recruitment, child labor, working hours,wages and benefits, health and safety, environmental requirements, business ethics and etc. However, the checklist for supplier evaluation was not very detailed and did not break down the necessary evaluation items. The manager strictly followed and monitored the execution of the procedure if subcontractors and homeworkers were used. The facility conducted a CSR assessment of the suppliers, but did not closely track the improvement of the problems identified by the assessment.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding

← Code area 8

Code area 9 →

No findings

Systems and evidence examined to validate this code section	System: 1. A site tour showed that all production processes were present in the unit. 2. No sub-contracting or home-working was used in the facility. 3. As per management interview and factory tour, there was no homeworker used by the factory. Evidence: 1. List of approval suppliers 2. Production records 3. Interview with management and workers 4. Site tour

← Code area 8

Code area 9 →

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 facility carried out social compliance assessment for their suppliers regularly. No supplier was found to use homeworker.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No The facility did not use sub-contractor.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

← Code area 8.A

Code area 9 →

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	The facility's prevention of harassment and abuse policy and procedure outlining the systems in place to manage this issue at the site. Further details could be found in the Employee Handbook, Prohibition Physical Punishment and Abuse Control Procedure, etc., these including relevant requirements of the code area. Although the facility has declared compliance with relevant regulations. However, the facility did not regularly evaluate the procedure and policy in use so there was a risk that the procedure and policy was not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. The facility had appointed HR manager to manage the anti-harassment and no inhumane treatment issue in the facility. They assessed the risks of harsh or inhumane treatment in the workplace and developed and implemented corresponding measures. The general manager and managers of each department received relevant social responsibility training, including no harsh or inhumane treatment. They used this knowledge to develop effective procedural documents and to conduct training for facility workers. The general manager strictly followed and monitored the execution of the procedure to ensure no harsh or inhumane treatment was occurred.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 8.A

Code area 10.A →

Systems and evidence examined to validate this code section	System: 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. Employee interview confirmed that employees were aware of the disciplinary procedure. 2. As per management interview, document review and employee 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 will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system. Evidence: 1. The policies 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

← Code area 8.A

Code area 10.A →

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
What type of grievance mechanism(s) are available?	Employees could raise their grievances directly to supervisors, worker representative and send emails to state their opinions and suggestions, and then the management would post corresponding feedback on the bulletin board.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

← Code area 9

Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended

← Code area 9

Code area 10.B →

Management systems

Explanation for management systems grades	The facility's policy to "promote environmental protection work and enhance enterprise environmental awareness" outlined the systems in place to manage this issue at the site, including all relevant requirements of the code area. Further details could be found in the "Environmental Safety and Health Management Procedures". The facility did not have regular review plan for the policies and procedures to ensure compliance with the latest requirements. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. The R&D supervisor was responsible for implementation, and aware of their responsibilities. Even if the R&D supervisor had been trained and obtained all the required certificates, it was recommended that the facility should appoint a full-time environmental officer. The general manager and managers of each department received environmental protection related law training. They used this knowledge to develop effective procedural documents and to conduct training for facility workers. But some workers were not aware of the importance of environmental sustainability. The general manager strictly followed and monitored the execution of the procedure to ensure compliance with environmental regulations, continuous energy conservation and emission reduction. The facility should use more scientific methods and more systematic management system, such as establishing an ISO14001 system, to make the environmental management more effective.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

← Code area 9

Code area 10.B →

Systems and evidence examined to validate this code section	System: 1. The facility management maintained all legally required environmental documents in place which proved that the production of the facility was in compliance with the related environmental regulations. 2. The facility had collected the related laws of environmental protection and they were updated regularly. 3. The facility had learned about the environmental impact of the site and conducted training for all employees. Evidence: 1. The policy on prevention of environment 2. Laws of environmental protection 3. Training records 4. Interview with management and workers

← Code area 9

Code area 10.B →

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 certificates.
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?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	System: 1. Ms. Lin(Manager) was responsible for the environment management system in the facility. 2. Registration of emissions from fixed pollution sources was available for review. 3. All of the legally required certificates including the registration form of environmental impacts of the construction, Approval of environmental impact assessment document and the environmental protection check and acceptance were available and valid during this audit. 4. The annual monitoring report for noise, waste air and wastewater showed the pollutant discharging was compliance with environmental law. 5. The factory had signed contract with the qualified collector and all hazardous waste generated by the factory would be submitted to the collector. 6. Based on management and employees' interview, they were trained on environmental protection. Evidence: 1. The policy on prevention of environment 2. Environmental impact assessment and approval 3. Pollutant monitoring report 4. Energy conservation and emission reduction plans, measures and monitoring records 5. Hazardous waste recovery contract and transfer records 6. Training records 7. Interview with management and workers

← Code area 10.A

Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Prioritising local suppliers Responsible use and management of water
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes This was included in the site's internal management system.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 2 greenhouse gases (GHGs)
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Not Applicable

Usage/discharge analysis

← Code area 10.B

Code area 10.C →

	Last full calendar year (2025)	Previous full calendar year (2024)
Total electricity consumption from non-renewable sources (kWh)	186,879	204,290
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details)	Other (provide details)
	0	0
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	0	0
Has the site completed any carbon footprint analysis?	No	No
Water sources	Municipal water supply	Municipal water supply
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,201	1,286
Water discharged	Municipal sewage	Municipal sewage
Water volume discharged (m3)	1,201	1,286
Water volume recycled (m3)	0	0
Total waste produced (mt)	0.6	0.6

← Code area 10.B

Code area 10.C →

Total hazardous waste produced (mt)	0.2	0.2
Waste to recycling (mt)	0.2	0.2
Waste to landfill (mt)	0.2	0.2
Waste to other (mt)	0	0
Total product produced (mt)	13,100	9,086

← Code area 10.B

Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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

← Code area 10.B

Management systems

Explanation for management systems grades	The facility's business ethics documents outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Further details could be found in the Anti-bribery and Anti-corruption Management Procedure, this including relevant requirements of the code area. Although the facility has declared its understanding of current and relevant legislation related to bribery, corruption, unethical or any type of fraud or unethical business practices. However, the facility did not regularly evaluate the procedure and policy in use so there was a risk that the procedure and policy was not in compliance with the latest regulations. The documents clearly assigned responsibilities, outlined processes, and addressed all code areas. It also provided a letter of appointment for Manager to be in charge of the commercial ethics content of the facility. The manager was responsible for implementation and was aware of his responsibilities, and had been working in the facility for many years and has a good understanding of the policy content and the situation of the facility. Furthermore, the factory management system achieves this by solidifying the division of responsibilities and authorities, establishing alternative mechanisms, and preserving knowledge and experience to cope with personnel changes: clearly defining the main/auxiliary/monitoring positions for each role, and formulating a matrix for responsibility substitution; conducting regular cross-training and reserve talent planning, simultaneously standardizing the handover process for personnel changes, supplemented by hierarchical supervision, to ensure that there are no gaps or reductions in management during personnel departures or absences. New employees were required to attend on-boarding training from the management. According to management and workers interview, the facility also held an annual training on facility's procedure for everyone. However, after the training, the facility did not conduct an assessment of the training's effectiveness and regularly conduct training needs analysis to develop future training plans to adapt to changes in operating conditions. Manager followed and monitored the execution of the procedure, to ensure compliance with business ethics regulations. But the facility did not proactively conduct the survey and investigation for workers and its suppliers to ensure that no potential business ethics risks occurred.

Summary of findings

← Code area 10.B

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	System: 1. Ms. Lin(Manager) was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery. 2. The factory established a business ethics policy which was communicated to workers through posters and training. 3. The factory had received and read the Business Ethics policy of the auditor/audit company. 4. The Business Ethics policy, worker handbook and training record had provided to auditor for reviewed. Evidence: 1. Business ethics policy including Bribery and Corruption 2. Business ethics commitments signed by suppliers 3. Training records 4. Worker handbook and Reports from Anonymous email account 5. Worker and management interview

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	N/A

← Code area 10.C

Attachments

ZAA600241335_BMNB033184-01B_Huizhou Jayi Acrylic Products Co Ltd_Periodic_11-12 Nov 2026_CAPRSignature(4P).pdf

ZAA600241335_BMNB033184-01B_Huizhou Jayi Acrylic Products Co Ltd_Periodic_11-12 Nov 2026_Photo form(4P).pdf