SMETA
powered by Sedex

Sedex Members Ethical Trade Audit Report

Version 7

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

Contents

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.

← Contents

Findings →

Audit details

Site details

Sedex site reference	ZS408410866	**Site name**	Shenzhen Kean Silicone Product Co ltd
Business name	Shenzhen Kean Silicone Product Co ltd	**Site address**	101-401, No. 52, Xinhe Road, Shangmugu Community, Pinghu Street, Longgang District, Shenzhen, China 深圳市龙岗区平湖街道上木古社区新河路52号厂房101-401 Shenzhen CN 518111

Audit details

Sedex company reference	ZC408400390	**Auditor company name**	SGS-China
Audit company address	No. 430, Jihua Road, Bantian, Longgang District, Shenzhen, CN, 518129		
Date of audit	2025-11-10	**Audit conducted by**	Lavonne Wen
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out	Day 1		Day 2	
	In	10:00	In	09:10
	Out	21:00	Out	12:00

Audit type	Periodic

← Contents

Findings →

Was the audit announced?	Semi announced
Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Yang Aihua / 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	No union was established in factory.		
Reason for absence during the audit	No union was established in factory.		
Reason for absence at the closing meeting	No union was established in factory.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	This audit is Semi-announced with 4 weeks window (2025.10.20-2025.11.14)

Lead auditor	Lavonne Wen	**APSCA Number**	32400257
Additional auditor			
Date of declaration	2025-11-11		

← Contents

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	Yang Aihua
Title	Manager
Date of declaration	2025-11-11

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601174004
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601174003
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601174001
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law	NC ZAF601174002
10.A. Environment 2-Pillar	10.A.C Have a system in place for identifying...		GE ZAF601187521

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	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems
9. No harsh or inhumane treatment is allowed	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems
10.A. Environment 2-Pillar	Some improvements recommended	Robust management systems	Some improvements recommended	Some improvements recommended
10.C. Business ethics	Robust management systems	Robust management systems	Some improvements recommended	Robust management systems

- 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	ZC408400390	
Sedex site reference	ZS408410866	
Company name	Shenzhen Kean Silicone Product Co ltd	
Business ownership type	GOODS	
Site name	Shenzhen Kean Silicone Product Co ltd	
Site name in local language	深圳市科安硅胶制品有限公司	
GPS location	**GPS address**	101-401, No. 52, Xinhe Road, Shangmugu Community, Pinghu Street, Longgang District, Shenzhen, China
	Coordinates	Longitude: E114°6’28'' Latitude: N 22°39’59''
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Yang Aihua
	Job title	Manager
	Phone number	0755 84676258
	Email	mike@keansilicone.com
Applicable business and other legally required business license numbers and documents	Business license No.: 914403005776670455,Valid From June 27, 2011 to an indefinite period. The validity period of the Factory Fixed Pollution Source Registration Form is from From May 18, 2025 to May 17, 2030.	

← Management systems

Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of other rubber products
	Secondary	
	Other	
Product type	Silicone foldable water bottles, silicone household products, and silicone mother and baby products	
Process overview	The main product in the factory were Silicone foldable water bottles, silicone household products, and silicone mother and baby products. The manufacturing processes were : Material warehouse - Baking workshop - Mold making - Injection molding - UV process - Radium carving-Assembly - Packing process - Finished goods The main machines: 43 sets (12 sets of mold manufacturing equipment, 10 sets of silicone molding equipment, 21 sets of assembly and packaging equipment). Main production lines:7. Main production lines and equipments used:2	
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?	3200m²

← Management systems

Worker analysis →

Site scope

Building 1	**Last construction works on site**	1998
	If building is shared, provide details	NA
	Number of floors	4
	Description of floor activities	1F: Mold manufacturing and silicone molding 2F: Assembly packaging 3-4F: Warehouse
Building 2	**Last construction works on site**	1998
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	1F: Warehouse
Building 3	**Last construction works on site**	1998
	If building is shared, provide details	NA
	Number of floors	5
	Description of floor activities	1F: External shops of other individual merchants, not located within the park 2F: Restaurant, Dormitory 3-5F: Dormitory

Is there any difference between the site scope of the audit and the Sedex site profile?	No
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No

← Site details

Worker analysis →

Site scope

Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	Yes
Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional
Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	All All accommodation was included in this audit.
Does the site organise worker transport to the worksite?	Not applicable The worker's place of residence is very close to the work area.

← Site details

Worker analysis →

Work patterns

Approximate workers on site per month (% of peak)	**January**	90-95%	**February**	75-90%
	March	90-95%	**April**	90-95%
	May	90-95%	**June**	90-95%
	July	75-90%	**August**	90-95%
	September	90-95%	**October**	90-95%
	November	90-95%	**December**	90-95%

Is there any night shift work at the site?	Yes Factory two shift work positions: CNC personnel, UV personnel, and injection molding personnel belong to two shift work, shifts: 8:00-20:00/20:00-8:00.
What percentage of the workforce, including temporary and agency workers, work during the night shift?	7%
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes All shifts are included in the scope of this audit, with 4 people sampled for night shifts and 6 people sampled for day shifts.

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	Other certification The factory has obtained FSC forest certification with the number FCOC44822, valid until September 2, 2026.

← Site details

Worker analysis →

Site assessments

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 site did not assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No No HRIA was conducted within the last three years at this site.

← Site details
Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	36	*(45%)*	44	*(55%)*	-	-	80	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	36	*(45%)*	44	*(55%)*	-	-	80	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	31	*(47%)*	35	*(53%)*	-	-	66	*(82.5%)*
International migrant workers	0	-	0	-	-	-	0	*(0%)*
Total migrant workers	31	*(47%)*	35	*(53%)*	-	-	66	*(82.5%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from	Top three sources of employees from other provinces: Guangxi Province, Hubei Province, Hunan Province

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	3	*(60%)*	2	*(40%)*	-	-	5	*(6.3%)*
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	The factory has no obvious production off-season. The number of workers is not affected by seasons.
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	45%	55%	-	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	36	*(45%)*	44	*(55%)*	-	-	80	*(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	36	*(45%)*	44	*(55%)*	-	-	80	*(100%)*
Other	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

If other payment cycle entered, please provide details	NA

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	8	*(88.9%)*	1	*(11.1%)*	-	-	9
Supervisors or team leaders	1	*(20%)*	4	*(80%)*	-	-	5
Administrative staff	0	*(0%)*	2	*(100%)*	-	-	2

← 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 groups of 5 workers (a total of 5 workers)
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← 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) No negative concerns or complaints raised by workers.
What did the workers like the most about working at this site?	Pay Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.) Work environment – comfort (e.g. temperature, noise or dust levels)
Additional comments	The workers were assured of confidentiality, and they spoke freely of their views of the factory. some workers said they were satisfied with the working conditions at the factory and that they were satisfied with the current wages which in their view were in line with wages in the locality. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. The workers could raise their suggestions effectively to the supervisor,factory manager, general manager or worker representative, They felt able to complain directly to their supervisors but also felt free to give their general concerns, such as working condition to worker representative who would take it to the management.
Attitude of workers' committee/union representatives	Interviewing with the worker representative, the representative said factory management were very care about workers and pay more attention to deal with workers' suggestion or complain. The worker representative showed that the management was kind and the workplace was comfortable. No negative information was identified.

← Worker analysis

Measuring workplace impact →

Attitude of workers

Attitude of managers	The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they had implemented a Health & Safety committee to take care of health and safety concerns.The factory agreed that the auditor accesses to all facilities, and all requested documents and records were provided in a timely manner.The factory agreed that the auditors took photos and copy relevant documents or records in the factory.The factory agreed that the auditor conducted confidential interviews with employees who were chosen freely without any influence by the factory.

Workers interviewed by type

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

Workers interviewed by group/individual

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

← Worker analysis

Measuring workplace impact →

Workers interviewed by group/individual

Workers interviewed individually	2	3	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	3	4	-	7
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	3	4	-	7

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	2.0%	-	2.0%
Last full calendar year (2024)	4.0%	4.0%	-	8.0%
Previous full calendar year (2023)	2.0%	6.0%	-	8.0%

* 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)	0.02%	0.05%	-	0.07%
Last full calendar year (2024)	0.04%	0.04%	-	0.08%
Previous full calendar year (2023)	0.03%	0.05%	-	0.08%

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?	No The factory has provided work injury records for the past 2 years for review,no accidents occurred, no work-related injuries 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 (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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

Lost day work cases (per 100 workers)*

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

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

Percentage of workers that work on average more than 48 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 (2024)	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 (2023)	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 (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1.The factory allow the auditor to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself, and provide the auditor 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 provide an accurate site description and Sedex site profile declared prior to the audit. 4.The factory maintain a written human rights policy statement that is 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 examined: Details: 1.Worker and management interview 2.human rights policy 3.site profile 4.Employee manual 5.training records 6. Sedex SAQ

← 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

← 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	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory has formulated written policies and procedures regarding Forced Labour, which outlines the key mechanisms for preventing forced labour. This procedure includes content of freedom of employment, resignation,overtime, and movement, for example, workers could be freely resignation after communication with management in advance 30 days notification. The factory regularly reviews and updates of these policies and procedures, which are signed by the top management, and posts them on the employees' noticeboard. Resources: Manager was assigned responsibility for implementation, and aware of the responsibilities. The Manager has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory. Training: All workers have done a series of relevant training. They are trained to recognize genuine and fake documents. There are also mechanisms to communicate with government agencies if needed for additional information or clarifications. Some interviewed workers cannot remember the specific meaning of forced labor clearly. Monitoring: The factory provides worker with grievance mechanisms e.g. suggestion boxes to receive feedback on their work, and records of grievance are kept. Also, the factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Based on the internal audit results, no negative evidence on forced, bonded or involuntary prison labours were identified.

← Code area 0 Code area 1.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1.The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification. 2.The workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment. 3.The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours. 4.No forced, bonded or involuntary prison labour was identified during the audit. 5. And according to onsite observation and interview statement of workers, workers confirmed that there was no any force labor exited in the factory, for example, they could resign according to legal requirement and they could leave the factory freely without being searched, etc. Besides, no inhumane or degrading treatment was found during the audit and according to interview with workers. Evidence examined: 1. Personnel files sampling review 2. Resignation records sampling review 3. Factory rules review 4. Employee manual review 5. Management and workers interviews.

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

← Code area 1

Code area 2 →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has established written policies and procedures regarding recruitment, the procedures include recruiting process and responsibilities of personnel responsible for recruitment, such as providing complete information to applicants during recruitment. The factory has formulated Employees Manual to outline the nature of work, location, working conditions including working time, living conditions and costs, employment terms, wages and benefits, etc. And the Employees Manual is available for all types of workers. Resources: Based on the procedures, there is a designated individual responsible for ensuring the implementation of the site policies. He is responsible for the policies' approval and regular review and implement the recruitment procedures, such as accurately communicating terms of employment to workers during recruitment and review workers' original ID card and cannot charge any recruitment fee. Communication & Training: Training at site is specifically managed by the training manager. The recruitment policies are available and communicated to all workers. Training on the recruitment policies is mandatory for all HR staff processing applications or onboarding. However, the training does not cover the requirement of "recruitment fee". Monitoring: Responsibilities for monitoring implementation of legitimate right to work are defined by the Recruitment Procedure. The procedure requires that this verification is conducted by the HR Manager. The factory retains records such as ID copy in workers' personnel records to evidence that workers that they employ have the legal right to work. HR manager regularly checks the authenticity and legality of workers' materials to effectively protect workers' rights.

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	Current systems: 1.All workers in the factory were Chinese. Most workers were migrant workers which came from other provinces. All workers had the proper legal rights to work in this region. 2.No labor agency was used by the factory. 3.The factory had established recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment. Through management interviews, employee interviews, and document review, no cases of charging additional recruitment fees to workers, such as agency fees, recruitment fees, training fees, file fees, etc., were found. 4.No foreign worker was used by the factory. Evidence examined: Details: 1.Hiring procedure 2.Personnel files and labor contracts 3.Employee handbook 4.Employee roster 5.Worker 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	82%
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	Top three sources of employees from other provinces: Guangxi Province, Hubei Province, Hunan Province.

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
Were recruitment fees or costs identified during worker interviews?	No All sample workers reported that they did not need to pay any recruitment fees or costs to work at the audited factory.

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

← Code area 1.A

Code area 3 →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has formulated written policies and procedures about freedom of association and the right to collective bargaining, including theworker representative election process and requirements. The procedures recognize workers' rights to freedom of association and the right to collective bargaining. The factory posts them on the employees' noticeboard to inform workers of their right to join or form an independent trade union or worker committee, and their rights to collective bargaining. Resources: Based on the procedures, there is a designated individual responsible for ensuring the implementation of the site policies. He is responsible for the policies'approval and regular review. He is clear about specific operational responsibilities for implementing the procedures, such as encouraging workers to select worker representative. Communication & Training: The factory provides relevant training to all workers and the training covers the content of workers' right to join or form an independent trade union, and their rights to collective bargaining. And the procedures about freedom of association and the right to collective bargaining are available and communicated to all workers. Through interviewed, the workers are encouraged by the factory to join or form a worker committee. There is one worker committee at site and there is general awareness of existence of worker committees, their functions and their representatives amongst staff interviewed. The factory also provides training for worker representatives, through worker representative's interviewed, they know the committee duties such as meeting with their members and supporting actions needed to take forward the membership's requests. However, there are still some workers who do not know where the suggestion box is located. Monitoring: The election records including ballot record of worker representative are kept and provided for review which show that the worker representatives are freely elected. The factory provides worker committees and representatives with a safe and unmonitored space to conduct their work when needed. Meeting between committees and the site are conducted once every three months. The meeting notes and the evidence of action taken by management to address concerns reported by workers through the established worker committee are provided for review.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 1.A

Code area 3 →

Systems and evidence examined to validate this code section	Current systems: 1.The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China. 2.No trade union was established in the factory, but 2 worker representatives were elected in the factory. The worker representative attended the opening and closing meeting during the audit. 3.The worker representatives' meeting was conducted quarterly. 4.Through worker interview, the worker could raise their grievances or complaint through worker representative or management directly. Evidence examined: Details: 1.The policy on freedom of association 2.Interview with workers and management 3.Interview with worker representative 4.Election and meeting minutes

← Code area 1.A
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 the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← 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	Fundamental Improvements Required
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	Policies & Procedures: The factory has established a detailed policy on health and safety, such as 'Social responsibility program files'. The policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area, and further detail can be found in the EHS management procedures. Documents clearly assign responsibilities, processes in place and address all code areas. The factory did not provide a pre job occupational health examination report for a UV worker sampled on site. The occupational hazards involved in this position are xylene and acetone. Resources: The site has assigned responsibility for health and safety to a competent senior management representative. This individual has sufficient authority to lead the Health and Safety Committee and ensure that procedures are carried out, and the EHS management team members have been trained by external agencies. The EHS meeting is arranged once per quarter with the presence of the Health and Safety Committee and supervisors of each department to address EHS concerns and provide updates.Nevertheless, there is a lack of regular training to guarantee that the management meets the requisite standards. Communication & Training: The EHS Policy and procedure is communicated to workers annually. The factory provides training to workers and the EHS training covers building safety, fire safety, electrical and machine safety, first aid, and PPE usage. The training records are provided for review. On site inspection found that one worker in the CNC workshop did not wear earplugs, one worker in the assembly workshop who used a blowgun wore earplugs every month, and one worker in the laser engraving workshop did not wear a mask and goggles. Monitoring: Based on written procedure, the assessments are reviewed at least annually or when there is a process or physical change at the site, or in response to any health and safety incidents. And internal audits are carried out annually.There are gaps in the monitoring of procedures to ensure that workplace requirements are adequately managed on an ongoing basis. Monitoring failures led to NCs.

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 Base code	NC	ZAF601174004
	3.H Where identified as necessary to reduce r...	Local law Base code	NC	ZAF601174003

Systems and evidence examined to validate this code section	Current systems: 1. General Health and Safety management • Yang Aihua/Manager was responsible for issue of Health & Safety in the factory. • Minutes of meetings show that there were regularly meetings between H&S committee and H&S manager. • Ventilation, temperature and lighting were adequate for the production processes. • Sufficient clean toilets segregated by gender were available at all times to workers. • The factory provided potable water to workers free of charge in workshop. 2. Fire Safety • Evacuation plans were posted in all workshops and understood by all interviewed workers. • There were at least two exits in each workshop. • Sufficient fire-fighting equipments such as fire extinguishers, fire alarm and hydrants in the buildings. Regular inspection was taken by the factory per month. • Fire drill was conducted in the factory twice per year, the records were provided for review. 3. Electrical safety • All parts of electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards. • There was one competent electrician at the site and the certificate was provided for review. 4. Chemical safety • Chemical inventory list was available, and all chemicals had safety labels and secondary containment. • Workers in the chemical store area confirmed that they had been trained on correct handling procedures as well as what to do in an emergency. 5. Medical services • Sufficient first aid kits in each production area and they were well stocked. • There are 4 first aiders in the factory and certificates are provided for review. Evidence examined: Details: 1.Health and safety policy 2.Health and safety manual 3.Health and safety committee minutes 4.Fire acceptance certificates or records 5.Fire equipment maintenance records 6.Training records and certificates 7.Chemical list and MSDS 8.Fire drill records 9.Trained first aider register 10.Accident records

← Code area 2 Code area 4 →

11.Onsite observation
12.Worker and management interview

← Code area 2

Code area 4 →

Findings: non-compliances

ZAF601174004

Non-compliance

Due 2025-01-24

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

The factory did not provide a pre job occupational health examination report for a UV worker sampled on site. The occupational hazards involved in this position are xylene and acetone.工厂没有提供现场抽样的一名UV岗位工人的岗前职业健康体检报告，该岗位涉及的职业危害因素为二甲苯，丙酮。

Description (carried over)

The factory did not provide an occupational health examination report for a worker in the laser engraving position who was sampled on site. The occupational hazard factor involved in this position is dust.工厂没有提供现场抽样的一名镭雕岗位工人的职业健康体检报告，该岗位涉及的职业危害因素为粉尘。

Corrective and preventative actions

It is recommended that the factory provide occupational health examinations for all workers involved in occupational hazards.建议工厂为所有涉及职业危害因素的工人提供职业健康体检。

Corrective and preventative actions (carried over)

It is recommended that the factory provide occupational health examinations for all workers involved in occupational hazards.建议工厂为所有涉及职业危害因素的工人提供职业健康体检。

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Local law reference

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

* PDF generated at 08:58 (UTC) on 18 Nov 2025. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601174003

Non-compliance Due 2025-01-24

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title

279 - No/inadequate training in how to use Personal Protective Equipment (PPE)

Description

On site inspection found that one worker in the CNC workshop did not wear earplugs, One worker in the assembly workshop who used a blowgun did not wear earplugs, and one worker in the laser engraving workshop did not wear a mask and goggles.Note: The factory provides labor protection equipment to workers.
现场审核发现，CNC车间1名工人没有配戴耳塞，组装车间1名使用吹枪的工人没有佩戴耳塞，镭雕车间1名工人没有佩戴口罩和护目镜。备注：工厂有提供劳动防护用品给工人。

Status

Open*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3 Code area 4 →

Description (carried over)

Bade onsite audit found that two workers in the injection molding workshop of the factory were exposed to chemicals, but they were wearing disposable masks. However, the factory have provided activated carbon masks.现场审核发现，工厂注塑车间有2名工人接触化学品，但是配戴的是一次性口罩，工厂提供的有活性炭口罩。

Corrective and preventative actions

It is recommended that the factory supervise and educate workers on the proper use of labor protection equipment.建议工厂监督教育工人正确使用劳保用品。

Corrective and preventative actions (carried over)

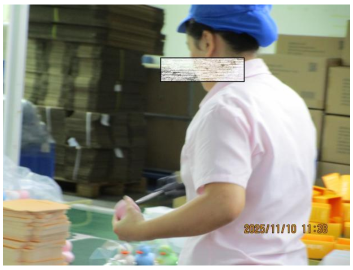
It is recommended that the factory supervise and educate workers on the proper use of labor protection equipment.建议工厂监督教育工人正确使用劳保用品。

Local law reference

Specification for the equipping of personal protective equipment Part 1: General provisions GB39800.1-2020.
3.2 The personal protective equipment provided by the employer for the operators shall be related to the environmental conditions, operating conditions and hazards of the workplace Appropriate to the degree of hazard, it should be appropriate for the operator, and the personal protective equipment itself should not cause other additional risks.

Evidence

The worker did not wear PPE.JPG



The worker did not wear PPE 1.JPG

* PDF generated at 08:58 (UTC) on 18 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
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 Some workers in certain positions may come into contact with chemicals such as cutting fluid and mold cleaning water.
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite) Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No additional buildings were found.
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

4. Child labour shall not be used

Management systems

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

← Code area 3 Code area 5 →

Management systems

Explanation for management systems grades	Policies & Procedures: The position of the factory is clearly stated in the Child Labour Prevention and Remediation Policy which meets all Workplace Requirements in this code area. The Policy outlines the key mechanisms in place for preventing using child labour and the placement of young workers in dangerous or unhealthy positions. This procedure covers all types of workers including third party employed workers. The Remediation Procedure outlines the procedures and responsibilities for remedying child labour. And the procedure defines actions that will be taken, stakeholders that will be engaged and remediation timeframes. Resources: The Senior Director is named within the Child Labour Prevention and Remediation Policy as ultimately responsible for ensuring its resourcing, approval and regular review. Communication & Training: Training is assigned to training manager. The Child Labour Prevention and Remediation Policy is available and communicated to all workers, however there is low awareness of it amongst staff interviewed, for example, all interviewed workers clearly knew the legal age and they all met the legal age when they joined the factory. But some workers didn't know the relevant requirement about young workers. Monitoring: Responsibilities for monitoring implementation of age-verification are defined by the Hiring Procedure. The procedure requires that the age verify is conducted by the HR leads. The factory keeps the copy of ID card of workers and age verification records are consistently maintained.

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	Current systems: 1.The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their original copies of ID card were kept in their personnel file. And the policy stated that the factory never employed and used any child labour under the age of 16 years old. 2.The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, also did not arrange young workers to hazardous post. 3.Checks of all workers files showed that no child labour or young worker was identified during the audit. The youngest worker in the factory is 22 years old, born on August 12, 2003, and entered the factory on October 8, 2025. 4.Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour. Evidence examined: Details: 1.Policy on workers recruitment 2.Personnel files including the ID card copies of workers 3.Roster and labour contracts of all workers 4.Worker and management interview

← Code area 3

Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	6%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	22
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?	No

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

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has established procedures and policies about wages and benefit, including minimum wage, overtime wage, social insurance, statutory holiday and annual leave, etc. The factory regularly reviews and updates of these policies and procedures and posts them on the employees' noticeboard Resources: The factory has appointed a senior manager responsible for this “Legal wages are paid” field, who understands his responsibilities, possesses the skills and qualifications required to manage the workplace, and is responsible for implementing and executing the program. Communication & Training: All workers have done a series of relevant training on wage policies during onboarding, and regular refresher courses are provided to keep them updated. Multiple communication channels, such as staff meetings, posters, and suggestion box, are used to convey wage - relat Workers report relevant issues to the factory management representative through the appeal mechanism and monitor and implement relevant policies. Additionally, workers feedback regarding wages is closely monitored through informal channels, enabling prompt resolution of any issues that may arise. Some interviewed workers didn't know how to calculate overtime wage. Monitoring: Workers report relevant issues to the factory management representative through the appeal mechanism and monitor and implement relevant policies. Additionally, workers feedback regarding wages is closely monitored through informal channels, enabling prompt resolution of any issues that may arise.However, the factory did not monitor the calculation of overtime wages by workers in a timely manner and was not very clear about it.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601174001

← Code area 4

Code area 5.A →

Systems and evidence examined to validate this code section	Current systems: 1.All workers' wages were calculated by hourly rate. 2.Minimum wage guarantee system was established for all workers. The minimum wage standard in Shenzhen has been adjusted from 2360 yuan/month to 2520 yuan/month. The minimum wage for factory workers is higher than the local legal requirement of 2520 yuan per month, which is 2550 yuan per month. 3.The factory paid 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime, which was in line with legal requirement. 4.The factory provided social insurances for all eligible employees. 5.All workers were paid at 7th of following month by bank transfer and it was agreed by all workers, each worker was given a pay slip and signed for their wages. 6.All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Evidence examined: Details: 1. Salary records from November 2024 to October 2025 2.Attendance records 3.Local legal minimum wage documents 4.Wages and benefits policy 5.Labor contracts for all employees 6.Leave records and resignation records 7.Payment receipts of social insurance 8.Workers and management interview

← Code area 4 Code area 5.A →

Findings: non-compliances

ZAF601174001

Non-compliance

Due 2023-02-27

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

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

Description

There is a shortage of insured personnel for factory social insurance. On the day of the audit, there were a total of 95 employees, including 8 managers, 10 retirees, and 3 new hires. According to the latest social security ledger provided, the factory only provides pension, medical, work-related injury, maternity, and unemployment insurance to 67/74 (approximately 90.5%) employees who meet the qualifications for social security purchase, except for management personnel. In addition, the factory provides all employees with employer accident insurance valid from August 28, 2024 to August 27, 2025.工厂社会保险参保人员不足。 审核当天共有95名员工，包括8名管理人员，10名退休人员以及3名新入职人员。 根据提供的最新社保台账，工厂只给67/74(约90.5%)除却管理人员外符合社保购买资质的员工提供了养老、医疗、工伤、生育和失业保险。此外，工厂给所有员工提供了一份有效期从2024年8月28号到2025年8月27号的雇主意外险。

Description (carried over)

There is a shortage of insured personnel for factory social insurance. On the day of the audit, there were a total of 95 employees, including 8 managers, 10 retirees, and 3 new hires. According to the latest social security ledger provided, the factory only provides pension, medical, work-related injury, maternity, and unemployment insurance to 67/74 (approximately 90.5%) employees who meet the qualifications for social security purchase, except for management personnel. In addition, the factory provides all employees with employer accident insurance valid from August 28, 2024 to August 27, 2025.工厂社会保险参保人员不足。 审核当天共有95名员工，包括8名管理人员，10名退休人员以及3名新入职人员。 根据提供的最新社保台账，工厂只给67/74(约90.5%)除却管理人员外符合社保购买资质的员工提供了养老、医疗、工伤、生育和失业保险。此外，工厂给所有员工提供了一份有效期从2024年8月28号到2025年8月27号的雇主意外险。

Status

Closed (2025-11-11)*

Time given to resolve

90 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

← Code area 5 Code area 5.A →

Corrective and preventative actions

It is recommended that the facility should provide social insurance for all eligible employees. 建议工厂给所有符合社保资质的员工提供社保。

Corrective and preventative actions (carried over)

It is recommended that the facility should provide social insurance for all eligible employees. 建议工厂给所有符合社保资质的员工提供社保。

Local law reference

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

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

Timescales was confirmed by factory.

Evidence

Tax Payment Certificate.pdf

* PDF generated at 08:58 (UTC) on 18 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

5. Legal wages are paid

Data points

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

Worker renumeration

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

Summary information

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

← Code area 5 Code area 5.A →

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	20.0
	Max hours per month	92.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2520.0
Actual minimum wage	**Actual per hour**	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	2550.0
Minimum legal overtime wage	**Min per hour**	21.98
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable

← Code area 5
Code area 5.A →

Actual minimum overtime wage	**Actual per hour**	21.72
	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 samples from October 2025 (current month); 10 samples from August 2025 (random month); 10 samples from April 2025 (random month)
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning above minimum wage.
Are there any bonus schemes used?	No
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	Current systems: 1.The factory establishes the wage and benefit procedure documents, and implements them, supervises, and maintains them in accordance with the procedures. 2.The factory review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap. The factory calculates the living wage based on the second method of IDH: wage indicator typical family method. All workers participated in this survey on living wages. The actual wages received by workers are higher than their living wage. The gap analysis includes all employees, and the salary income in the gap analysis is consistent with the on-site salary records. 3.The factory put in place a wage improvement plan that aims to pay workers a living wage within a stated timeframe. Evidence examined: Details: 1.Worker and management interview 2.Payroll records 3.Local legal minimum wage documents 4.Wages and benefits policy 5.Labor contracts for all employees 6. Investigation and analysis of employees living cost.

6. Working hours are not excessive

Management systems

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

← Code area 5.A

Code area 7 →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has formulated detailed Working Hours policies and procedures which including commitment to all the SMETA requirements, attendance management, overtime regulations, overtime remuneration, as well as key responsibilities and procedures by which it would be implemented. The factory reviews and updates these policies and procedures regularly and posts them on the employees' noticeboard.However, the employee handbook does not include information on all worker shifts Resources: There is a designated individual responsible for ensuring the implementation of the site policies. Nevertheless, there is a lack of regular training to guarantee that the management meets the requisite standards. Communication & Training: The policies regarding on working hours are available and communicated to all workers. And the factory had developed an annual training plan, trained all workers according to the plan and the training records were provided for review.Training plan is in place but it is not followed in practice, and has led to systemic NC. Monitoring: The factory reviews and updates the policy regularly. Also, the factory assesses the effectiveness of these policies through regular monitoring and internal audits.The monthly overtime of the sampled workers in the factory exceeds 36 hours.Most factories are unable to ensure that the workers' monthly overtime hours are kept within 36 hours.

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	NC ZAF601174002

← Code area 5.A
Code area 7 →

Systems and evidence examined to validate this code section	Current systems: 1.Through employees' interview, overtime is voluntary. 2.According to attendance records and worker interview, basic working hours were 8 hours per day and 40 hours per week. 3. Electronic identification system was used to record workers' attendance records. 4.All sampled workers' monthly overtime hours exceeded 36 hours, the maximum overtime hours of production workers were 92 hours. 5.All sampled workers' weekly working hours not exceeded 60 hours, the maximum weekly working hours were 60 hours. 6.All sampled workers can work up to six days a week and resume work after taking a day off, the maximum continuous working days were 6 days. Evidence examined: Details: 1.Worker and management interview 2.Factory policy on working hours 3.Attendance records and payroll records 4.Workers' contracts 5.Warehouse and production records to cross check hours

← Code area 5.A

Code area 7 →

Findings: non-compliances

ZAF601174002

Non-compliance

Due 2023-02-27

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

Based on the attendance records provided by the factory from November 1, 2024 to the day of the audit, attendance records of 10 sampled workers in October 2025 (current month), August 2025 (random month), and April 2025 (random month) were selected. The results showed that: 1) in October 2025 (current month), the monthly overtime hours of 10 sampled workers (including all production processes) exceeded the regulatory requirement of 36 hours, with a maximum of 68 hours; 2) In August 2025 (random month), the monthly overtime hours of 10 sampled workers (including all production processes) exceeded the regulatory requirement of 36 hours, with a maximum of 92 hours; 3) In April 2025 (random month), the monthly overtime hours of 10 sampled workers (including all production processes) exceeded the regulatory requirement of 36 hours, with a maximum of 72 hours.
根据工厂提供的从2024年11月1日至审核当日的考勤记录，分别抽取2025年10月（当前月）, 2025年8月（随机月 ）和2025年4月（随机月）的10名抽样工人的考勤发现： 1) 在2025年10月（当前月）10名抽样工人（含所有生产工序）的月加班时间超过法规要求的36小时，最大为68小时； 2) 在2025年8月（随机月）10名抽样工人（含所有生产工序）的月加班时间超过法规要求的36小时，最大为92小时； 3) 在2025年4月（随机月）10名抽样工人（含所有生产工序）的月加班时间超过法规要求的36小时，最大为72小时。

Status

Open*

Time given to resolve

90 days

Verification method

Follow up audit

Area of non-compliance/non-conformance

Local law

← Code area 6

Code area 7 →

Description (carried over)

Based on the attendance records provided from December 1, 2023 to the day of the audit, as well as salary records from December 2023 to October 2024, the auditor selected 10 employees from different positions such as mold making, molding, and packaging from October 2024 (the most recent payment month), July 2024 (random sampling month), and April 2024 (random sampling month), and found that: (1) In October 2024, all sampled employees worked overtime for more than 36 hours per month, with a maximum of 68 hours. (2) In July 2024, all sampled employees worked overtime exceeding 36 hours per month, with a maximum of 86 hours. (3) In April 2024, all sampled employees worked overtime exceeding 36 hours per month, with a maximum of 82 hours.根据提供的2023年12月1号到审核当天的考勤记录以及2023年12月到2024年10月的工资记录，审核员分别从2024年10月（最近支付月）、2024年7月（随机抽样月）以及2024年4月（随机抽样月）抽取了10名来自不同岗位例如制模、成型和包装等，发现：（1）2024年10月，所有抽样员工月加班超过36小时，最大为68小时。（2）2024年7月，所有抽样员工月加班超过36小时，最大为86小时。（3）2024年4月，所有抽样员工月加班超过36小时，最大为82小时。

Corrective and preventative actions

It is recommended that the facility should arrange the production reasonably to ensure monthly overtime hours do not exceed 36. 建议工厂合理安排生产，确保月加班不超过36小时。

Corrective and preventative actions (carried over)

It is recommended that the facility should arrange the production reasonably to ensure monthly overtime hours do not exceed 36. 建议工厂合理安排生产，确保月加班不超过36小时。

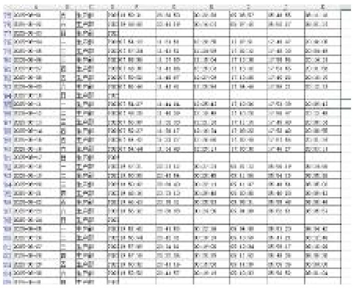
Local law reference

In accordance with Labor Law of the People’s Republic of China (2018 Amendment), Article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

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

Timescales was confirmed by factory.

Evidence



[exceeded the regulatory requirement of 36 hours.jpg]

* PDF generated at 08:58 (UTC) on 18 Nov 2025. View this finding on the Sedex platform for live updates and closure details.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	NA
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	56.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	60.0
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	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 6

Code area 8 →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has established policies and procedures regarding discrimination, including approach regarding recruitment, training, development and promotion processes, system on wages and transparency in remuneration, etc. Also, the implementation, clearly assigned responsibilities, and processes are formulated in the policy. Resources: The Senior Director is responsible for ensuring its resourcing, approval and regular review. HR is allocated responsibility to implement the Procedures, which includes all areas, to ensure that employment policies and processes are sufficient to prevent discrimination at all stages of employment. Communication & Training: The manager has received a high level of external training on discriminatory and used the knowledge to develop effective processes in place. Workers were also trained in discrimination, workers said they could complain to the Worker representative or their workshop supervisor.But some interviewed workers were not clear about the detailed requirement, they just said that they had not encountered any cases of discrimination, all requirements were fair for them. The factory also provides training to personnel responsible for recruitment, training,development, and promotion. Monitoring: Based on procedures, the factory ensures that grievance mechanisms such as suggestion boxes and telephone hotlines are accessible to all workers, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, and political affiliation. The factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Based on audit results, no grievances case involving discrimination was reported according to the record.

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	Current systems: 1.According to management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc.; female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill; training was based on working requirement. 2.There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found. 3.There was no evidence of sexual harassment. 4.The management generally knew the requirement of Non-Discrimination. 5.As informed by interviewed workers, most employees spoke highly of the factory management. 6.Support employee career development: Develop personalized career development plans for employees and encourage them to continuously learn and grow. Establish a mentorship system within the factory, allowing experienced employees to guide new employees and help them develop better. Evidence examined: Details: 1.The hiring and termination procedure, leave application records and employee handbook. 2.Payroll records 3.Attendance records 4.Termination records 5.Training records

← 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)?	1%
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	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems

← Code area 7

Code area 8.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has established procedures and policies regarding on employment, including the requirements of employment of agency workers, the requirements of labour contracts, etc. The main relevant requirements of the code area, documents clearly assigned responsibilities and processes are detailed in the policy. The factory regularly reviews and updates of these policies and procedures and posts it on the employees' noticeboard. Resources: Assign supervisors to review and update employment policies and procedures. He is clear about her responsibilities, able to coordinate all parties, control key processes, optimize process efficiency, and is competent in this position with comprehensive abilities, such as communicating contract terms before recruitment. Communication & Training: The factory provides training to all types of workers and the training records are kept. The training content includes the contractual terms, the interviewed workers also confirmed they signed the labour contract and got a copy.but some of them couldn't say the duration of the contract or detailed content in the contract. Monitoring: Based on written procedure, internal audits, monitoring of key performance indicators (in particular whether there is excessive use of agency,subcontracted or temporary labour) are carried out annually. Also, the factory periodically reviews the contractual terms to identify any unreasonable terms.

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	Current systems: 1.According to workers interview and management interview, workers signed contracts with the factory as local law's requirement. 2.All interviewed workers indicated that they were provided with contract copies to know all items included. 3.No temporary worker, apprenticeship schemes or home worker was identified. 4.The factory saved all workers' personal files and contracts for review. 5.The factory established employment procedure for workers' recruitment. 6.No labour agency was used to hire workers. Evidence examined: Details: 1.The hiring and termination procedure 2.Personal files 3.Payroll records 4.Labour contracts 5.Worker and management interview

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

Management systems

Explanation for management systems grades	Policies and procedures: The factory's Supplier social responsibility control procedures policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. This includes a comprehensive evaluation of potential subcontractors' qualifications, financial stability, and ethical practices. For homeworkers, the policy is an absolute prohibition. There are procedures in place to ensure that no part of the production process involves home - based work. Resources: The administrative supervisor is assigned to be responsible for implementation and understands their responsibilities. He can coordinate all parties, control key links, optimize process efficiency, and possess comprehensive abilities to perform this position. He has sufficient authority to ensure that all subcontractors comply with social responsibility standards. Training: The factory has established a certain training mechanism, with the management regularly participating in supply chain responsibility seminars and the grassroots workers receiving training on subcontracting management processes. If there are subcontractors, the factory will conduct regular reviews of them and require them to rectify any non - conformities within a specified timeframe. The factory provides relevant training for some key employees, but not all workers. Monitoring: The factory monitors and conducts internal audits on such code area. They always do not use homeworkers and sub-contractors. But based on the procedure, the factory has set up a system in place to assess the working conditions at sub-contracted sites including checking on each sub-contractors to ensure they operate as a legitimate business, undertaking regular assessments to assess that subcontracted workers' terms of engagement/employment and working conditions accord with local law and the ETI (Ethical Trade Initiative) Base Code, etc.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

← Code area 8

Code area 9 →

Systems and evidence examined to validate this code section	Current systems: 1.Confirmed by factory management, one sub-contractor was used by the factory. 2.The factory had established social accountability manual including sub-contracting control procedure. 3.No homeworking was identified in the factory. Evidence examined: Details: 1.Site tour 2.Materials in/out records 3.Interview with management and workers 4.Social accountability manual 5.Assessment records

← 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 No homeworkers was used by their suppliers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No Relevant compliance materials for review.

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	Yes	
Sub-contractor 1	**Processes subcontracted**	Screen printing process
	Name of factory	Dongguan Joel packing Products Co Ltd
	Address	Block A, No.93 Zhenxing Road, Shangjiao Community, Chang'an Town Dongguan, CN
	Dates used	2025

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

← Code area 8.A

Code area 10.A →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory has declared a policy commitment prohibiting harsh or inhumane treatment, including gender- based violence, endorsed at a senior level, which defines what is covered, and includes any unacceptable behaviors or practices, or the threat of those behaviors, that are intended to, result in, or are likely to result in physical, psychology, sexual or economic harm. Also, the factory has established disciplinary policies, which cover the expectations of workers, how performance and behavior is reviewed, and the escalation processes used where needed. The factory has established detailed policy and procedure regarding grievance to establish a defined process to address grievances with clear lines of accountability. The policies and procedures cover all workers on site including third party employed workers, and the factory regularly reviews and updates of these policies and procedures and posts it on the employees' noticeboard. Resources: Factory's Supervisor is assigned for implementing the policies and procedures relevant to disciplinary, grievance, harsh and inhumane treatment. He understands the responsibilities for his own behavior and how to recognize and act if He identifies harsh and inhumane treatment, punitive measures and grievance occurring. Communication & Training: The factory has developed an annual training programme to communicate and deliver policies and procedures relevant to disciplinary, grievance, harsh and inhumane treatment. All workers at site and the staff in positions of power or authority, such as managers, supervisors, administrative roles such as HR, security guards, etc. have been included in training programmes. There is general awareness of the amongst worker interviewed.Some interviewed workers are not very clear about the appeal process. Monitoring: The factory conducts internal audits and risk assessment to identify risks relevant to harsh or inhumane treatment, disciplinary and grievance. The risk assessment includes all types of workers at site. The factory has made measure to control risks relate to the risk assessment undertaken, including activities such as developing learning resources and training programmes. Besides, records of disciplinary cases are kept.

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	Current systems: 1.The factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure. 2.The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past. 3.There was an internal process for grievance, which was an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question. Evidence examined: Details: 1.The relevant policy on prevention of harassment and abuse. 2.Internal grievance procedure documentation 3.Training records 4.Worker and management interview

← 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 The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Suggestion box, worker representative, etc.
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	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 9

Code area 10.B →

Management systems

Explanation for management systems grades	Policies & Procedures: The factory's EHS Management Program policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. It includes clear guidelines for waste management, with procedures for sorting, storing, and disposing of different types of waste in an environmentally friendly manner. Procedures for handling environmental incidents are in place, including emergency response plans to quickly address any spills, leaks, or other accidents that could harm the environment.However, the fixed pollution source registration form was not fully filled out, and the information on hazardous waste and exhaust gas was not fully filled out. Resources: Based on the established environment procedure, the Production Supervisor has been appointed to oversee and implement the environment procedure.And EHS committee is established to maintain the factory's system and operation. The EHS meeting is conducted once per quarter to raise and solve related concerns on environment. Communication & Training: All workers have done a series of relevant training, such as how to properly dispose of waste, and how to identify and report environmental risks. The factory uses posters to keep workers informed about environmental goals, initiatives, and any updates to policies or procedures. However, some workers cannot remember the content of environmental protection training clearly. Monitoring: Based on the procedure, the factory conducts internal audit and risk assessments regarding on environment module. The Production Supervisor is responsible for making measure to solve the risk identified in the risk assessment.Based on internal audit results and during the audit, there was no negative case.The fixed pollution source registration form has information that is not filled in correctly and has not been accurately identified and corrected.

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
10.A. Environment 2-Pillar	10.A.C Have a system in place for identifying...		GE ZAF601187521

← Code area 9

Code area 10.B →

Systems and evidence examined to validate this code section	Current systems: 1.Based on management interview and document review, factory provided EIA and EIA approval. 2.The factory learned about the environment impact of their site and took continuously management measures to control the environment impact. 3.Based on workers interview, they were trained on environmental protection. 4.The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations. 5.The factory had procedure on environment protection and Yang Aihua/Manager was appointed to response the compliance of environment requirement. 6.The fixed pollution source registration form provided by the factory was not filled in completely according to the actual content. Evidence examined: Details: 1.Environmental policy and procedure 2.All legally required environmental documents were provided for review 3.Worker and management interview 4.Site tour 5.EIA and EIA approval

← Code area 9
Code area 10.B →

Findings: good examples

ZAF601187521

Good example

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.C Have a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations.

Description

The factory has obtained FSC forest certification with the number FCOC44822, valid until September 2, 2026工厂取得了FSC森林认证，编号：FCOC44822，有效期至2026年9月2日.

Evidence

FSC certificate.pdf

← Code area 10.A

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?	Nil
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	Yes The factory has obtained FSC forest certification with the number FCOC44822, valid until September 2, 2026.
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	Current systems: 1.Based on management interview and document review, factory provided EIA and EIA approval. 2.The factory learned about the environment impact of their site and took continuously management measures to control the environment impact. 3.Based on workers interview, they were trained on environmental protection. 4.The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations. 5.The factory had procedure on environment protection and Yang Aihua/Manager was appointed to response the compliance of environment requirement. 6. The factory has produced approximately 25.3 million products in 2024 and approximately 25 million products in 2023. Unit: Number of pieces. Evidence examined: Details: 1.Environmental policy and procedure 2.All legally required environmental documents were provided for review 3.Worker and management interview 4.Site tour 5.EIA and EIA approval

← 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?	Biodiversity and eco system impact management Switching to renewable energy sources Responsible use and management of water Circular economy and resource efficiency Prioritising local suppliers Packaging optimization Sustainable material sourcing Zero-waste and recycling protocols
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes This is included in the site's internal management system.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No

← Code area 10.B
Code area 10.C →

Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The relevant information has been provided for review and meets the requirements.

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	517,000	592,000
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
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	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	4,535	3,868

← Code area 10.B
Code area 10.C →

Water discharged	municipal sewage pipeline network	municipal sewage pipeline network
Water volume discharged (m3)	4,480	3,626
Water volume recycled (m3)	0	0
Total waste produced (mt)	18.7	19
Total hazardous waste produced (mt)	0.2	1
Waste to recycling (mt)	18.7	19
Waste to landfill (mt)	0	0
Waste to other (mt)	0	0
Total product produced (mt)	Data not available	Data not available

← 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	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies & Procedures: The factory has established procedures and policies about business ethics, including anti-corruption, anti-bribery, anti-improper competition, fair competition, etc., that's updated according to legal requirement. Resources: Supervisors are assigned to implement and understand their responsibilities. He can coordinate all parties, control key links, optimize process efficiency, and possess comprehensive abilities to perform this position. He has sufficient authority to ensure that all workers comply with business ethics standards. Communication & Training: The factory provides business ethics training to all workers and employees in higher risk positions such as management, finance, purchasing and logistics. The policies and procedures are available and communicated to all workers.however, some interviewed workers didn't know the details about business ethics. Monitoring: The factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Also, the factory conducts regular risk assessment to identify potential ethical business hazards. Based on the internal audit result, there was no negative case.

← Code area 10.B

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current systems: 1. The company 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 company established a business ethics policy which was communicated to workers through posters and training. 3. The site had received and read the Business Ethics policy of the auditor/audit company. 4. There is an internal grievance process, which is an anonymous email address. Evidence examined: Details: 1.The company business ethics policy 2.Bribery and Corruption policy 3.Training records 4.Worker handbook

← 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	Nil

← Code area 10.C

Attachments

[SMETA-JSASCN25591534-Shenzhen Kean Silicone Product Co ltd-November 10-11, 2025-Annual-Photo Report.pdf]

[SMETA-JSASCN25591534-Shenzhen Kean Silicone Product Co ltd-November 10-11, 2025-Annual-Onsite CAP.pdf]