DBID: 402899 and Audit Id: 187881 Audit Type: Full Audit Audit Date: 31/07/2020



Auditee :	Zhejiang Innerwell Household Products Co., Ltd
Audit Date From :	31/07/2020
Audit Date To :	31/07/2020
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company:	TUEV Rheinland
Auditor's Name(s):	Lewis Ye(Lead)
Auditing Branch (if applicable):	TUV Rheinland China



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.

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DBID: 402899 and Audit ld: 187881 Audit Type : Full Audit

Rating Definitions

Audit Date: 31/07/2020



A combination of ratings per Rating Consequence Performance Area where: Minimum 7 Performance Areas rated A The auditee has the level of maturity . No Performance Areas rated C. D or E. to maintain its These are three examples: improvement process A A A A A A A A A A A A without the need for a Very Good AAAAAAAABBB follow-up audit. AAAAAABBBBBB . Maximum 3 Performance Areas rated C The auditee has the level of maturity · No Performance Areas rated D or E to maintain its В These are three examples: improvement process A A A A A B B B B B B without the need for a Good follow-up audit. ABBBBBBC B B B B B B B B C C C The auditee needs · Maximum 2 Performance Areas rated D follow up to support its No Performance Areas rated E progress. Following the These are three examples: C completion of the audit, the auditee develops Acceptable a Remediation Plan В В AB В within 60 days. . Maximum 6 Performance Areas rated E. The auditee needs These are three examples: follow up to support its D progress, Following the AAAAAA completion of the audit, Insufficient the auditee develops a Remediation Plan 0 0 0 0 0 0 0 within 60 days. amfori BSCI · Minimum 7 Performance Areas rated E Participants shall These are three examples closely oversee the Е auditee's progress as the producer may Unacceptable represent a higher risk than other business partners. A Zero Tolerance issue was identified (see Immediate actions are amfori BSCI System Manual Part V - Annex required. The amfori 5: amfori BSCI Zero Tolerance Protocol) **BSCI Zero Tolerance** Zero Tolerance Protocol is to be followed.



DBID : 402899 and Audit Id : 187881 Audit Type : Full Audit Audit Date : 31/07/2020



Main Auditee Information



Name of producer :	Zhejiang Innerwell Household Products Co., Ltd										
DBID number :	402899	402899									
Audit ID :	187881	187881									
Address:	(Inside Zhejiang Hongtai Kitchenware Co. Town, Wuyi County, Jinhua	(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County, Jinhua									
Province :	Zhejiang	Chejiang Country: China									
Management Representative :	Hongliang CHENG										
Contact person:	Huijia HU	Sector:	Non-Food								
Industry Type :	Construction	Construction Product group : Kitchen merchandise									
Product Type :	Aluminum cookware										



DBID: 402899 and Audit Id: 187881

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Audit Details					
Audit Range :	⊠ Full Audit	Follow-	up Audit		
Audit Scope :		☐ Main Au	iditee & Farms		
Audit Environment :	☐ Industrial	Agricult	ural :	Small Producer	
Audit Announcement :	⊠ Fully-Announced	Fully-Ur	nannounced 🔲 🤄	Semi-Announced	
Random Unannounced Check (RUC):	No				
Audit extent (if applicable) :	none				
Audit interferences or contingencies (if applicable):	none				
Overall rating :	С				
Need of follow-up:	Yes		If YES, by :	31/07/2021	
	•	•	•		•

Rating p	er Perfor	mance A	rea (PA)									
PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	Α	Α	Α	Α	D	Α	Α	Α	Α	Α	С	Α

Executive summary of audit report

Zhejiang Innerwell Household Products Co., Ltd was located at "(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County, Jinhua City, Zhejiang Province, China-中国浙江省金华市武义县泉溪镇泉二村永武一线北侧(浙江宏泰厨具有限公司内)". The auditee was specialized in the manufacturing of aluminum cookware, the main production activities included stretching, cleaning, sandblasting, automatic paint-spraying, polishing, lathing, assembling, inspection and packing. As claimed by factory management that all production processes were completed in the factory and no process or products were subcontracted or contracted by other factories. No obvious peak season or low season in the past year.

The auditee currently used the half 1F (about 3024 square meters at east side) and half 4F (about 3024 square meters at east side) of one 4-storey production building as production and warehouse: the half 1F was used as raw materials warehouse, chemical warehouse, stretching section, cleaning section and sandblasting section; the half 4F was used as finished goods warehouse, accessories warehouse, automatic paint-spraying section, polishing section, lathing section, assembling and packing section. In addition, the auditee used the 2F of one 5-storey office building as office.

During the audit, the factory management and sampled workers were cooperative. The factory management demonstrated a willingness to gradually improve all issues found during the audit. The workers expressed their positive attitude to the management.

Remark:

1. Auditor: Lewis Ye; APSCA registration number: 21701875.

- 2. There were total 4 blocks of buildings (including two 1-storey production buildings, one 4-storey production building and one 5-storey office building) within the boundary and all buildings were owned by Zhejiang Hongtai Kitchenware Co.,Ltd which manufactured kitchenware, the auditee only rented the half 1F and half 4F of the 4-storey production building, and the 2F of the 5-storey office building from the landlord. The other half 1F (at west side) of the 4-storey production building was owned by the landlord; the other half 4F (at west side) of the 4-storey production building was owned by the landlord and empty during audit date. The 1F, 3F, 4F and 5F of the 5-storey office building were used as office by the landlord. The two 1-storey production buildings were used as production and warehouse by the landlord. Per management interview, employee interview and factory tour, the auditee and the landlord had independent business licenses and management systems, no employee was shared. The auditee did not have business relationship with the landlord except building lease. The auditee provided independent business license and lease contract for review, so this audit scope just focused on the rented area of the auditee. (The auditee did not hire any gate keeper, the gate keepers belonged to the landlord and they had no relationship with the auditee)
- 3.Through National Enterprise Credit Information Publicity System checking, the auditee updated its business license's address information from "(5th floor of No.1 Building of Zhejiang Yufeng Industrial Co., Ltd) Qilijingtang Area, Xicheng, Yongkang, Jinhua City, Zhejiang Province-浙江省金华市永康市西城七里经堂厂区内(浙江宇峰实业有限公司第一幢第五层)" to "(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County, Jinhua City, Zhejiang Province-浙江省金华市武义县泉溪镇泉二村永武一线北侧(浙江宏泰厨具有限公司内)" on 21 May 2020. The distance between the two addresses was about 20 Kilometers. The factory management claimed that they finished the moving and started normal operation at the current address since June 2020. Through management and employee interview, there was no office or production activities any more in the previous old address.
- 4.The auditee name in amfori BSCI platform was "Zhejiang Innerwell Household Products.,Ltd". Confirmed with the auditee management, the name should be revised as "Zhejiang Innerwell Household Products Co., Ltd" to make it more professional.
- 5.The address in amfori BSCI platform was "Quaner Village, Quanxi Town, Wuyu City, Jinhua City, Province, China", but the address in business license was "(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County, Jinhua City, Zhejiang Province, China". Confirmed with the auditee management, the different descriptions referred to the same location. In order to be consistent with the address in business license, the auditee chose to use the address "(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County, Jinhua City, Zhejiang Province, China" in this audit report /amfori BSCI platform.
- 6.a)No contractor was used by the auditee, which makes the contractor license/permit not applicable; b)No agency was used by the auditee, which makes the agency labour contract not applicable; c)No government waiver such as Comprehensive Working Hours System waiver or social insurance waiver was



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obtained by the auditee, which makes the government waiver not applicable; d)No collective bargain agreements existed in the factory, which makes the collective bargain agreements not applicable; e)The factory was not compulsively required to obtain pollution discharge permit or register its pollutant emission on the website of national discharge permit management information platform at this stage, which makes the environmental license not available.



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Ratings Summary



Auditee's background information									
Auditee's name :	Zhejiang Innerwell Household Products Co., Ltd	Legal status :	Limited Company						
Local Name :	浙江英奈维家居用品有限公司 (91330784MA28QPH81X)	Year in which the auditee was founded :	2017						
Address:	(Inside Zhejiang Hongtai Kitchenware Co.,Ltd) North Side of Yongwu First Line, Quaner Village, Quanxi Town, Wuyi County,	Contact person (please select) :	Huijia HU						
Province :	Zhejiang	Contact's Email :	office@innerwellcooker.com						
City:	Jinhua	Auditee's official language(s) for written communications :	Chinese						
Region :	North East Asia	Other relevant languages for the auditee :	None						
Country :	China	Website of auditee (if applicable) :	www.innerwellcooker.com						
GPS coordinates :	N 28°52'13" E 119°51'57"	Total turnover (in Euros) :	4000000.00						
Sector :	Non-Food	Of which exports % :	100.00						
Industry :	Construction	Of which domestic market % :	0.00						
If other, please specify :		Production volume :	3200000 pieces per year						
Product Group :	Kitchen merchandise	Production cost calculation :	Yes						
If other, please specify :		Lost time injury calculation cost :	Yes						
Product Type :	Aluminum cookware								

Auditee's employment structure at the time of the audit										
Total number of workers : 45	Total numl	Total number of workers in the production unit to be monitored (if applicable):								
		MALE WORKERS	FEMALE WORKERS							
Permanent workers		27	18							
Temporary workers		0	0							
In management positions		2	1							
Apprentices		0	0							
On probation		0	0							
With disabilities		0	0							
Migrants (national citizens)		21	13							
Migrants (foreign citizens)		0	0							
Workers on the permanent payroll		27	18							
Production based workers		0	0							
With shifts at night		0	0							
Unionised		0	0							
Pregnant		-	0							
On maternity leave		-	0							



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Finding Report



Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: D

Deadline date:30/07/2021

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

CSR management policies and procedures had been established by the factory, which was based on amfori BSCI Code of Conduct and relevant national laws. amfori BSCI code of conduct was posted on site. The factory had appointed one senior management representative in charging of implement of amfori BSCI management system. Although the factory moved location, they still had conducted risk assessment, internal and external audits to maintain the system's effectiveness. The factory established systems to monitor its business partners' social insurance and second audits were conducted for the main business partners, and signed social accountability commitment letter, amfori BSCI COC and TOI with those.

工厂依据amfori BSCI行为准则以及相关法规建立了社会责任政策和程序。amfori BSCI行为准则张贴在现场。工厂任命了一名高级管理代表来负责 amfori BSCI管理系统的执行。工厂虽然有搬过地址,但还是有通过风险评估、内审和外部审核来维护amfori BSCI体系运行的有效性。工厂建立了系统去管控其商业伙伴的社会责任的执行情况,并对其主要商业伙伴进行了定期的二方审核,也和他们签署了社会责任承诺书,amfori BSCI行为 准则以及商业伙伴实施条款。

- 1.1 The factory had established management procedures to implement amfori BSCI Code of Conduct, such as working hour rules, wages and benefits system and occupational health & safety policies etc., but the factory did not have a systematic planning on obeying and supervision. The factory established management system on controlling working hour, but the system was not effectively implemented and excessive overtime was detected. In addition, though social insurance was indicated in labor contracts, social insurance was still not sufficient. The heathy and safety management still needed improvement, such as insufficient chemical control, machine safety and PPE control etc. No effective environmental control. These non-compliances requires continues improvement.
 - 工厂建立了管理程序来实施amfori BSCI行为准则,例如工时制度、工资福利制度和职业健康安全政策等,但是在遵守和监督方面没有系统的规划。在工时方面建立了管理程序,但没有有效实施,仍存在加班超时的情况。另外,虽然合同中规定缴纳社会保险,但目前员工的社保缴纳不足。工厂的健康安全管理仍需提高,如化学品管控、机械设备管控及劳保用品管控方面仍有不足。工厂也没有有效的环境管控等。这些不符合项需要持续改进。
- 1.4 The factory established production capacity assessment procedure. However, the factory didn't have a good capacity planning to meet the expectations of the delivery order, which led to the monthly overtime hours exceeded legal requirement. Through management interview, they understood the production rate and date of delivery, but the workforce capacity was accounted by experience. Due to the factory did not ensure workers' hours in accordance with the law requirements in past months (PA 6.2), so the management system on working hours could not be effectively perfected when the factory could meet the requirements of the client orders continually.

工厂制定了生产能力评估程序,然而工厂没有一个完善的产能计划去完成预期的订单交货以致于月加班时间超过法规要求。根据管理人员访谈,他们清楚了解工厂生产效率和交货期,但工厂的产能评估是依据经验。由于工厂在过去月份里无法保障工人的工作时间符合法规要求(PA6.2),因此在生产能持续满足客户订单需求的同时,工时管理系统无法被有效执行。

Remarks from Auditee:

None

Performance Area 2: Workers Involvement and Protection

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:30/01/2021

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory had established document procedure that involved workers and their representative in sound information exchange on workplace issue. One worker representative was elected by workers freely, communication meetings between management and worker representative were regularly conducted. The factory made management and workers to be aware of their rights and responsibilities and have sufficient competence by trainings and communications. The factory kept annual training plan and training records for review. 工厂建立了文件化的程序以便于工人及其代表参与交流工厂场所的有关信息。工人自由选举出了1名工人代表。工厂管理层跟工人代表定期进行交流。工厂通过培训,交流等方式使管理人员及工人了解其权利和责任,并具备相应能力。工厂制定了年度培训计划并且提供了培训记录。

流。工厂通过培训,交流等方式使管理人员及工人了解其权利和责任,并具备相应能力。工厂制定了年度培训计划并且提供了培训记录。

The long-term goals established by the factory did not reflect a step-wise approach toward making sustainable improvements, such as how to

2.2.2 - The long-term goals established by the factory did not reflect a step-wise approach toward making sustainable improvements, such as now to reduce overtime hours, improvements of social insurance compliance and improvement the EHS management level etc. within specified period, workers and workers' representatives were not genuinely involved in defining the long-term goals, workers were not aware of the long-term goals, and it didn't get approval by the competent person.

工厂制定的长期目标未反映做出可持续改进的渐进式方法,比如在指定期限内怎样降低加班时间和提高社保参保以及提升环境健康安全管理水平等,员工及员工代表未真正参与员工长期保护目标的制订,员工不清楚该长期目标,该目标也未得到授权人员的批准。

Remarks from Auditee:

None



Zhejiang Innerwell Household Producer: **Products Co., Ltd**

DBID: 402899 and Audit Id: 187881

Audit Date: 31/07/2020



Performance Area 3: The rights of Freedom of Association and Collective Bargaining

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

Audit Type: Full Audit

None无

AREAS OF IMPROVEMENT:

The factory respected the right of personnel to form, join and organize trade unions of their choice and to bargain collectively on their behalf with the factory. No collective bargain agreement was concluded between the factory and workers, but the factory did not prevent workers from bargaining for the agreement. One worker representative was freely elected by all workers. Based on the interview statement of worker representative, worker representative was not discriminated by the factory, worker representative could access to workers and workplace freely. 工厂尊重员工根据自己意愿建立、加入以及组织工会并与企业方进行集体谈判的权利。工厂和员工无集体谈判协议,但工厂也未阻止员工和工厂谈判。工厂所有员工自由选举了1名员工代表。根据员工代表的访谈,员工代表在该工厂未被歧视,可以随时进入车间和员工沟通。

Remarks from Auditee:

None

Performance Area 4: No Discrimination

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

Any kind of discrimination was strictly prohibited in the factory. The factory provided relevant training to workers to let they knew what was discrimination, how to face, solve and report, etc. And the management also told the workers do not worry about any retaliation for reporting discrimination issue. No obvious discrimination accrued in the factory, the employment, salary and position arrangement of workers were not

based on sex, age, region, nation, religion etc. 任何形式的歧视在工厂都是被禁止的。工厂给员工提供了培训来让员工知道什么是歧视,如何面对、解决以及举报等,工厂管理层也告诉员工不要担心因为举报歧视事件而受到报复。工厂没有明显的歧视现象发生,员工的雇佣、收入和岗位的安排并不基于性别、年龄、地域、民族、宗教信仰

Remarks from Auditee:



DBID: 402899 and Audit Id: 187881

Audit Date : 31/07/2020



Performance Area 5: Fair Remuneration

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:30/07/2021

GOOD PRACTICES:

Audit Type: Full Audit

None无

AREAS OF IMPROVEMENT:

Compensation and wage procedure was established to ensure that all workers had been paid at least minimum wages for regular working hours, legal required overtime premium for workers' overtime working, etc. Wage records from July 2019 to June 2020 were provided for review, 9 workers' wage records respectively in November 2019, March 2020 and June 2020 were selected as samples, all sampled workers were paid by hourly rate and at least RMB12.65 per hour, which was higher than the legal minimum wage (local legal minimum wage was RMB1800 per month equivalent to RMB9.54 per hour (1660/21.75/8) since 1 December 2017). The whole calendar month was counted as a wage calculation cycle, and the corresponding wage was paid on or before the 30th days of next month by cash (the payment date was changed from 15th days to 30th days since November 2019). According to employees interview and review of wage records, it was noted that there were no illegal deductions in the factory and the factory did not postpone to issue wages. All workers were provided with sufficient overtime compensation, workers were paid 150% of normal rate for overtime work on weekdays and 200% of normal rate for overtime work on weekends (only on Saturdays). Workers did not work on Sundays and statutory holidays. According to the factory policy and employees interview, it was noted that the factory would pay 300% of normal rate as compensation for workers who had worked on statutory holidays. As shown in the payrolls, paid annual leave and paid holidays were provided. The wage reflected the skills and education of workers by the grade of basic wage.

not work on Sundays and statutory holidays. According to the factory policy and employees interview, it was noted that the factory would pay 300% of normal rate as compensation for workers who had worked on statutory holidays. As shown in the payrolls, paid annual leave and paid holidays were provided. The wage reflected the skills and education of workers by the grade of basic wage.

工厂建立了薪酬福利的程序文件以确保所有员工至少达到最低工资、法定加班工资等要求。工厂提供了2019年7月至2020年6月的工资记录供审核,9名员工在2019年11月、2020年3月和2020年6月的工资记录作为样本抽取,所有抽样工人的工资为时薪制,最低工资至少RMB12.65元每小时,高于法定最低工资(当地法定最低工资标准自2017年12月1日起办1660元每月等同于9.54(1660/21.75/8)元每小时)。工资计算周期是一个完整自然月,在下个月30日或之前通过现金发放(工资支付日期从2019年11月开始由15日更改为30日)。根据工人访谈和工资记录的意阅,工厂党有不合理的扣款,没有拖欠工人的工资。所有的工人均得到了充足的加班补偿,工人在工作日加班获得了正班工资的1.5倍,在周末加班(仅周六)获得了正班工资的2倍。工人没有在周日和法定节假日加班。根据工厂的政策和工人访谈,员工如果在法定节假日加班,工厂会提供正班工资3倍的补偿。工资记录显示工厂提供了带薪年假和法定假日给员工。工资通过不同基本工资的等级来体现员工的教育水平或技能水平。

5.5 - Insufficient social insurance participated. There were total 45 employees hired at the factory during audit date, no employee was retiree hired to work again and no employee was new hired in recent one month, so the factory should provide social insurance to 45 employees. Social insurance records from July 2019 to July 2020 were reviewed. According to social insurance receipt of April 2020, 31 out of 45 employees were not provided with retirement insurance, medical insurance, unemployment insurance and child-bearing insurance. The factory management stated that they would fully support and follow workers' purchase intention, some workers did not want participate in social insurance. The workers who did not participate in other four kinds of social insurance confirmed that they abandoned social insurance voluntarily because they had participated in local rural retirement and medical insurance. Reference law: Social Insurance Law of the People's Republic of China, Article 10, 23, 44, 53. (Remark: work-related injury insurance covered all 45 employees; the factory did not collect employees' information of participating in rural retirement and medical insurance)

种会保险参保不足。工厂审核当天一共雇佣了45名员工,无退休返聘员工,最近一个月无新进员工,因此工厂应该为45名员工提供社会保险。审核查看了2019年7月到2020年7月的社保记录。根据2020年7月的社保凭证,工厂没有为45名员工中的31名提供养老、医疗、失业和生育保险。工厂管理层表示他们完全支持和遵循员工的购买意愿,一些员工不愿意参加社保。未参加其它四险的员工确认他们自愿放弃社保因为他们已经参加了当地的农村养老和医疗保险。参考法律法规:《中华人民共和国社会保险法》第10,23,44,53条。(备注:工伤保险涵盖了所有45人;工厂没有搜集员工参与农村养老和医疗保险的信息)

Remarks from Auditee:

None



Audit Date: 31/07/2020

DBID: 402899 and Audit Id: 187881

Audit Type : Full Audit

amfori @ BSC

Performance Area 6: Decent Working Hours

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: D

Deadline date:30/07/2021

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory established working hour management procedure. The factory respected workers right of decent working hours. Normal working hour was 8 hours per day and 5 days per week. Electronic fingerprint/face scanning attendance system was used to record working hours. Attendance records from 1 July 2019 to 31 July 2020 were reviewed. All workers worked in one shift for 8 hours per day from 08:00 to 17:00, one hour lunch break from 11:30 to 12:30 was provided. Overtime was conducted for 2 hours from 18:00 to 20:00 on weekdays. Saturday overtime was usually conducted for 8 hours, and no Sunday or holiday overtime was conducted. Based on the sample records, maximum 2 hours overtime per day, 12 hours overtime per week, 54 hours overtime per month and 1 day off after 6 days consecutive working days was guaranteed. Sufficient overtime wage was paid to all workers. During the worker interview, workers confirmed that they worked overtime voluntarily. And workers had right to rest in resting breaks in every working day, such as go to toilet, drink water. The testimonies of interviewees related to working hour information matched with the provided records.

工厂建立了工作时间管理程序。工厂尊重员工体面工作时间的权利。正常工作时间为每天8小时和每周5天。工厂使用电子指纹/面部识别考勤系统来记录工作时间。审核查看了自2019年7月1日至2020年7月31日的考勤记录。所有员工都是一班制每天8小时从08:00到17:00,午饭休息时间1小时从11:30到12:30。平日加班2小时从18:00到20:00。周六通常加班8小时,周日及节假日没有加班。所抽取样本考勤中,最大日加班时间2小时,周加班12小时,月加班54小时,最长连续工作6天。加班费有足额支付。访谈确认员工加班自愿。同时员工允许在工作时间获得必要的休息,如上洗手间,饮水等。受访员工的反馈信息和提供的记录一致。

6.2 - The factory did not establish effective system to control and anticipate the production processes to reduce overtime hours. The factory management stated they needed to arrange production plan based on order status and it was very difficult to keep monthly overtime within 36 hours in order to delivery on time, but one day off per week was guaranteed. The interviewees stated that they preferred to earn more money through overtime hours. Based on the attendance records from 1 July 2019 to 31 July 2020, the maximum daily OT was 2 hours, workers' monthly overtime hours exceeded 36 hours from July 2019 to July 2020 except January 2020 and February 2020. Details of sampled months as below: November 2019: 9 out of 9 sampled workers' monthly OT exceeded 36 hours and was 48 hours; June 2020: 9 out of 9 sampled workers' monthly OT exceeded 36 hours and was 48 hours; June 2020: 9 out of 9 sampled workers' monthly OT exceeded 36 hours and was 42 hours. (Reference Law: PRC Labour Law article 41). The maximum overtime hours from 1 July 2020 to 30 July 2020 was 42 hours. 工厂没有建立有效的系统来控制和预估生产过程以减少加班时间。工厂管理层表示他们需要根据订单情况来安排生产计划,为了准时交货要控制月加班在36小时以内是非常困难的,但是每周休息一天是有保证的。访谈的员工表示他们愿意通过加班时间来赚更多的钱。根据2019年7月1日至2020年7月31日的考勤记录发现,最大的日加班为2小时,从2019年7月至2020年7月除2020年1月、2月外,员工的月加班都超过36小时。抽样月份的情况如下:2019年11月:9名抽样员工中的9名的月加班超36小时,为54小时;2020年06月:9名抽样员工中的9名的月加班超36小时,为48小时;2020年06月:9名抽样员工中的9名的月加班超36小时,为42小时。(参考法律法规:中华人民共和国劳动法第41条)2020年7月1日至2020年7月30日的最大加班时间是42小时。

Remarks from Auditee:

None



Audit Date: 31/07/2020

DBID: 402899 and Audit Id: 187881

Audit Type : Full Audit



Performance Area 7 : Occupational Health and Safety

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:30/04/2021

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The occupational health and safety procedures had been established. The factory established OHS committee. Relevant law and regulations on occupational health and safety for its activities had be collected regularly. The factory conducted risk assessment on OHS. The EHS representative knew that the machinery safety risk, chemical safety risk and fire safety risk were maximum risks in the factory. The factory provided series of trainings to increase workers' health and safety awareness, such as fire safety, machinery safety, PPE using, electrical safety and etc. All stretching machines were euipped with infrared ray. Warning signs were posted on the high risk machines. Occupation hazard notification cards, PPE warning signs and safety operation procedures were posted in relevant positions. Free PPEs including masks, earplugs, gloves and goggles were provided relevant workers. The main chemicals used in the factory were paint and thinner, relevant MSDS were collected and posted on site. The factory established first aid program, there was one trained first aider in the factory, there was first aid kit in each workshop, basic suppliers such as scissors, tweezers, gauze, medical alcohol, band-aid, burn ointment and so on were provided in the first aid kit, the interviewee stated that they could use the first aid kit freely. Eye washer was installed in the chemical using area. Clean drinkable water was available in factory. Sufficient fire extinguishers and fire hydrants were installed and inspected monthly. Evacuation routes were not blocked, all safety exits were kept open during working time. Fire alarms, emergency lights and exit signs were installed properly and inspected monthly. The factory established the work-related injury management procedures, the work-related injury record sheet and work-related injury research report were reviewed but no work-related injury happened in the past year. No canteen, dormitory and transportation facility was provided by the factory

工厂建立了职业健康与安全的程序。工厂建立了职业健康安全委员会。工厂定期地收集了与其活动相关的职业健康与安全方面的法律法规。工厂针对职业健康安全进行了风险评估。环境健康安全代表知道机械安全风险、化学品安全风险和消防安全风险是工厂最大的风险。工厂有提供一系列的培训来增加员工的健康安全意识,例如消防安全、机械安全、劳保用品使用、电气安全等。所有拉伸机配备了红外线。高风险的机械设备上张贴了警示标识。职业危害告知卡、劳保用品整示标识和安全操作规程张贴在相关的岗位。免费的劳保用品包括口罩、耳塞、手套和护目镜提供给了相关的员工。工厂主要使用的化学品是油漆和稀释剂,相关的MSDS有被收集和张贴在现场。工厂建立了急救程序,工厂内有1名经过培训的急救员,每个车间都有一个急救药箱,急救箱里面提供了基本备品,例如剪刀、镊子、纱布、医用酒精。创可贴、烫伤膏等,访谈人员表示他们可以自由使用药箱。洗眼器安装在化学品使用区域。干净的饮用水被提供在车间。足够的灭火器和消火栓已安装并每月进行检查。逃生路线未被堵塞,所有安全出口在上班期间保持打开。警铃、应急灯与安全出口标识合理安装并每月进行检查。工厂建立了工伤管理程序文件,通过工伤记录表和工伤分析报告,发现在过去一年内没有工伤发生。工厂没有提供食堂、宿舍和交通设施给员工。

- 7.1 1.The factory did not implement the occupational health and safety management system effectively. Findings observed during the implementation of OHS management system, which included the occupational hazard factors monitoring, occupational health examination, chemical management and equipment management etc. 2.The factory did not conduct the occupational hazards factors testing, such as noise level in sandblasting workshop, dust level in sandblasting /polishing workshop, air quality in paint-spraying workshop. Reference law: Provisions on the Supervision and Administration of Workplace Occupational Health Article 20. 3.No pre-job, on-service and post-service occupational diseases examination was provided for workers exposed to occupational hazards position (e.g. the sandblasting workers exposed to noise, the polishing/sandblasing workers exposed to dust, the paint mixing workers exposed to hazardous gas). Reference law: Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35.

 1.工厂未有效执行职业健康与安全的管理系统。在职业健康与安全管理系统的执行中仍存在一些发现点,包括职业危害因素监测、职业健康体检、化学品管理、设备管理等。 2.工厂没有委托进行职业危害因素检测。例如喷砂车间的噪音,抛光喷砂车间的粉尘,喷漆车间的空气质量。参考法律法规: 《工作场所职业卫生监督管理规定》第20条。3.工厂未给有职业病危害工种的人员提供岗前、在岗和离岗职业病体检(如:接触噪音的喷砂员工,接触粉尘的抛光/喷砂员工,接触看害气体的调漆员工)。参考法律法规: 《中华人民共和国职业病防治法》第35条。
- 7.5 It was noted that hazardous chemicals such as paint and thinner were used in paint-spraying workshop, the factory had established dangerous chemical emergency succor plan, but no relevant drill was conducted. Reference law: Regulation for Safety of Dangerous Chemical Article 70. 喷漆车间有使用到危险化学品例如油漆和稀释剂,工厂已制定危险化学品事故应急救援预案,但没有进行相关的演习。参考法律法规: 《危险化学品安全管理条例》第70条。
- 7.6 About 30% workers worked in paint-spraying line were wearing improper month guards, they were wearing the cotton masks, instead of the anti-chemical masks. Meanwhile, no steel-toed shoes were provided to the mould worker. Reference law: Work Safety Law of the People's Republic of China, Article 42.
 - 大约30%的在喷漆线的员工使用了不恰当的口罩,他们使用了棉布口罩,而不是防化学品口罩。另外,工厂没有提供钢头鞋给模具员工。参考法律法规:《中华人民共和国安全生产法》第**42**条。
- 7.7 1.The factory did not manage the chemical adequately, although the factory established chemical management procedure, and provided relevant training to workers. Based on onsite observation, no secondary containers were available for about 40% hazardous chemicals (such as paint and thinner) used in paint-spraying workshop. Reference law: Regulations on the Safety Management of Dangerous Chemicals, article 20. 2. The chemical warehouse stored hazardous chemicals including paint and thinner, but no flammable gas detection and alarm device was installed. Reference law: Technical Conditions for Storage and Maintenance of Flammable and Explosive Commodities, Article 4.2.1. 3.It was noted that no ventilation device was available in the chemical warehouse. Reference Law: Regulations on the Safety Administration of Hazardous Chemicals, Article 20.
 - 1.工厂对化学品管理不到位,尽管工厂建立了化学品管理程序,且给员工提供了相关的培训。根据现场观察,喷漆车间使用的大约40%的危险化学品(例如油漆和稀释剂)没有配备二次容器。参考法律法规:危险化学品安全管理条例第20条。2.化学品仓库存储有危险化学品包括油漆和稀释剂,但未安装可燃气体检测报警装。参考法律法规:《易燃易爆性商品储存养护技术条件》第4.2.1条。3.化学品仓库没有通风设施。参考法律法规:危险化学品安全管理条例第20条。
- 7.17 1.lt was noted the pulley guard of 1 out of 2 punching machines was missing. Reference law: General rules of design on health and safety of production facility (GB5083-1999) 6.1.6. The factory management stated that the protected cover dropped and did not maintenance in time. 2.lt was noted they 2 out of 2 punching machines were used pedal control type, but no protective covers were installed for the pedals of the 2 punching machines. Reference law: Article 5.4.4.3 of Safety codes for cold pressing. 3.lt was noted that 1 ladder was equipped for the paint-spraying equipment was more than 1.8 meters, but no handrail was installed for the ladder. No relevant falling or injury occurred in the past year. Reference law: Safety of machinery Permanent means of access to machines and industrial plants Part 3: Stairways, stepladders and guard rails GB17888.3 -2008.
 - 1.审核发现2台冲床中其中1台皮带轮保护罩缺失。参考法律法规:生产设备安全卫生设计总则(GB5083-1999)6.1.6。工厂管理层表示保护盖掉了没有及时维护。2.审核发现2台冲床均为脚踏控制式,但这2台冲床的脚踏无防护罩。参考法律法规:《冷冲压安全规程》第5.4.4.3条3.喷涂设备上配备的一台梯子的垂直高度超过1.8米,但该梯子没有安装扶手。过去一年没有发生过相关的坠落或工伤。参考法律法规:《机械安全进入机器和工业设备的固定设施第三部分:楼梯、阶梯和护栏》GB17888.3-2008。
- 7.19 The factory didn't sign quick medical agreement with near hospital to response in case of trauma or serious illness happen. Through management and employee interview, no serious injury or accident occurred in the past year. 工厂未和附近的医院签订紧急救护协议以应对突发的伤害或严重疾病。根据管理层和员工访谈,过去一年没有发生过严重的工伤或事故。

Remarks from Auditee:



DBID: 402899 and Audit Id: 187881

Audit Type: Full Audit

SCHOIG

Audit Date: 31/07/2020



None

Performance Area 8: No Child Labour

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENTS

The recruitment policy and procedure clearly defined that the factory prohibited employing the child labour who under 16 years old. The recruitment staff must check the original ID card to check if the candidate was the child labour. The factory established the child labour remediation procedure in the event of employed the child labour mistakenly. According to reviewing the workers' roster, workers' personnel files, labour contracts and site observation, no child labour was found in the factory.

招聘政策和程序明确规定被工厂禁止雇用16岁以下的童工,招聘人员必须检查原身份证,检查候选人是否是童工。工厂建立了童工补救程序以应对如果误雇佣童工。根据审查员工花名册、员工人事档案、劳动合同和现场观察,工厂内未发现有存在童工。

Remarks from Auditee:

None

Performance Area 9: Special protection for young workers

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory established necessary mechanisms to prevent, identify and mitigate harm to young workers. The factory understood the legal requirement of young workers according to interview with management. No young worker was identified in the factory. 工厂建立了必要的管理机制来识别未成年工,防止或者减少对于未成年工的伤害。根据管理层访谈,工厂了解未成年工保护法。在审核过程中,未发现有未成年工的存在。

Remarks from Auditee:

None

Performance Area 10 : No Precarious Employment

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

Based document review, management interview and workers interview, all workers were hired by the factory directly. Labor contract was signed once per three years, the content was understood by workers. One copy of the labor contract was kept by each worker. 基于文件审阅,管理层访谈和员工访谈,所有的员工都由工厂直接招聘。劳动合同每三年签一次,内容都被员工了解。劳动合同的一个副本由员工保存。

Remarks from Auditee:

None

Performance Area 11: No Bonded Labour

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory established the policy on anti-forced labor. Based on document review and employee interview, the factory did not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, no inhumane or degrading treatment was found. 工厂制定了反强迫劳动的政策。根据文件审核和员工访谈,工厂未参与到任何形式的奴役、强迫劳动、抵债性劳动、契约奴役、拐卖或非自愿劳动,员工也未遇到任何被侮辱或非人道的待遇。

Remarks from Auditee:

None



Audit Date: 31/07/2020

DBID: 402899 and Audit Id: 187881

Audit Type: Full Audit

Performance Area 12: Protection of the Environment

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: C

Deadline date:30/07/2021

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory established environment protection policy and identified relevant environmental factors. The main production activities included stretching, cleaning, sandblasting, paint-spraying, polishing, lathing, assembling, inspection and packing. Noise generated from stretching, sandblasting and polishing processes. Waste air generated from sandblasting, polishing, paint-spraying and natural gas burning processes, waste air treatment facilities were installed. Little wastewater was produced from cleaning process, the cleaning process used degreaser, wastewater discharged to local sewage plant after disposing through settling pond and wastewater treatment facilities. The hazardous wastes including empty chemical containers and paint slag were transferred to a qualified unit for disposing. The factory was not compulsively required to obtain pollution discharge permit or register its pollution emission on the website of national discharge permit management information platform at this stage by local environmental protection department.

- 工厂建立了环境保护的政策,并识别相关的环境因素。主要的生产工序包括拉伸、清洗、喷砂、喷漆、抛光、车床加工、装配、检验和包装。拉 一种、喷砂和抛光过程产生噪音。喷砂、抛光、喷漆和天然气燃烧过程产生废气,废气处理设施已安装。清洗过程产生少量废水,清洗过程使用除油剂,废水经过沉淀池和废水处理设施处理后排放至当地污水厂。危险废弃物包括空的化学品容器和漆渣转移给了一家有资质的单位处置。当地环保 部门现阶段未强制要求工厂取得排污许可证或在全国排污许可证管理信息平台网站进行排污登记。
- 1. The factory did not compile Environmental Impact Report Form as per the legal requirement and obtain approval from environmental authority. 12.1 -Reference law: Article 16 and Article 22 of Law of the People's Republic of China on Appraising of Environment Impacts. 2. The factory did not obtain the environmental protection acceptance check report for their completed construction project. Reference law: Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project article 17.

 1.工厂没有按照法规编制环境影响报告表以及没有从环保局获得批复。参考法律法规: 《中华人民共和国环境影响评价法》第16条和第22条。 2.工
 - 厂没有获得其建设项目竣工环境保护验收报告。参考法律法规: 《建设项目竣工环境保护验收管理办法》第17条。
- 12.4 1.The paint-spraying and drying processes could discharge waste air to the outside, but the factory didn't supervise its waste air emission in recent one year. Reference law: Measures for the Administration of Environmental Surveillance, Article 21. (Remark: the latest monitoring was conducted in March 2019) 2. The sandblasting and stretching processes could discharge noise to the outside, but the factory did not conduct the boundary noise monitoring. Reference law: Law of the People's Republic of China on Prevention and Control of Pollution from Environmental Noise, Article 23.
 - 1.喷漆和烘干过程向外界排放废气,但工厂未监测其废气的排放。参考法律法规:环境监测管理办法第21条。(备注:最近一次的监测是2019年3 月) 2.喷砂和拉伸过程向外界排放噪音,但工厂未进行厂界噪音监测。参考法律法规:中华人民共和国环境噪声污染防治法第23条。
- There was industrial wastewater generated from cleaning process, but the factory didn't monitoring its wastewater index. Reference law: Law of the People's Republic of China on Prevention and Control of Water Pollution, Article 10. 清洗工序产生工业废水,但工厂未监测其废水排放指标。参考法律法规:《中华人民共和国水污染防治法》第10条。

Remarks from Auditee:

Performance Area 13: Ethical Business Behaviour

Full Audit [Audit Id - 187881] Audit Date: 31/07/2020 PA Score: A

Deadline date

GOOD PRACTICES:

None无

AREAS OF IMPROVEMENT:

The factory had established anti-bribery and anti-corruption procedure, and introduced to employees via training. The factory also established grievance mechanism for workers to report unethical behaves. The privacy protection and personal information safety policy were also

工厂建立了反贿赂、反腐败程序,并且通过培训传达给员工。工厂也建立了适当的投诉机制以便工人举报不道德的行为。也建立了个人隐私保护和 个人信息安全的政策。

Remarks from Auditee:



DBID: 402899 and Audit Id: 187881 Audit Type: Full Audit Audit Date : 31/07/2020



Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	31/07/2020	187881	D	A	A	A	A	D	A	A	A	A	A	С	A	С



DBID: 402899 and Audit Id: 187881













DBID: 402899 and Audit Id: 187881 Audit Type : Full Audit

























Photo of the inside of the main product Warning sign, JPG









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