

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

Audit details

Site details

| | | | |
|-----------------------------|--|---------------------|---|
| Sedex site reference | ZS1082624 | Site name | Dongguan Kenwood Paper Products Co Ltd |
| Business name | Dongguan Kenwood Paper Products Co Ltd | Site address | Room 101, Building 3, No.190 ChengXiang Road, Hengli, Hengli Town, Dongguan City, Guangdong Province 广东省东莞市横沥镇横沥城乡路190号3号楼101室 东莞 CN 523460 |

Audit details

| | | | |
|--------------------------------|---|-----------------------------|-------------------|
| Sedex company reference | ZC1060848 | Auditor company name | Intertek Shenzhen |
| Audit company address | 1F, Bldg. 3, Yuanzheng Science and Technology Industrial Park,, No. 4012, Wuhe Ave. North, Bantian Street, Longgang District,, Shenzhen, CN, 518107 | | |
| Date of audit | 2025-11-03 | Audit conducted by | Joyce Zheng |
| Audit pillars | Labour Standards Health and safety Environment 4-Pillar Business ethics | | |

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| Time in and out | Day 1 | | Day 2 | | Day 3 | |
|-----------------|-------|-----|-------|-----|-------|--|
| In | 09:00 | In | 15:00 | In | 08:40 | |
| Out | 17:00 | Out | 23:00 | Out | 16:40 | |
| Day 4 | | | | | | |
| In | 08:50 | | | | | |
| Out | 12:50 | | | | | |

Audit type Full initial

Was the audit announced? Semi announced

Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Mr. Wang Shangping / HR Supervisor

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

| | Senior management | Worker representative | Union representative |
|---|-------------------|-----------------------|----------------------|
| A: Present at the opening meeting? | Yes | Yes | No |
| B: Present at the audit? | Yes | Yes | No |
| C: Present at the closing meeting? | Yes | Yes | No |

Reason for absence at the opening meeting There was no union in the facility.

Reason for absence during the audit There was no union in the facility.

Reason for absence at the closing meeting There was no union in the facility.

SMETA declaration

Auditor team

SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

This is a semi-announce audit with the scheduling window from 30th October 2025 to 29th November 2025.

Lead auditor

Joyce Zheng

APSCA Number

21700298

Additional auditor

Date of declaration

2025-11-06

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Site representation

| | |
|----------------------------|--|
| Declaration | I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published. |
| Full name | Mr. Wang Shangping |
| Title | HR Supervisor |
| Date of declaration | 2025-11-06 |

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|---|--|------------------------|---------------------------------|
| 3. Working conditions are safe and hygienic | 3.N Ensure that all hazardous substances (e.g... | Local law Base code | NC ZAF601180142 |
| 10.A. Environment 2-Pillar | 10.A.B Comply with relevant local, regional a... | Local law Base code | NC ZAF601180143 |

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](#)


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

 Not addressed

 Fundamental improvements required

 Some improvements recommended

 Robust management systems

Site details

Company and site details

| | | |
|--|---|---|
| Sedex company reference | ZC1060848 | |
| Sedex site reference | ZS1082624 | |
| Company name | Dongguan Kenwood Paper Products Co Ltd | |
| Business ownership type | GOODS | |
| Site name | Dongguan Kenwood Paper Products Co Ltd | |
| Site name in local language | 东莞勤和纸品有限公司 | |
| GPS location | GPS address | Room 101, Building 3, No.190 ChengXiang Road, Hengli, Hengli Town, Dongguan City, Guangdong Province, China |
| | Coordinates | Not provided |
| Is the worksite in a remote location, far from habitation? | No | |
| Site contact | Contact name | Mr. Wang Shangping |
| | Job title | HR Supervisor |
| | Phone number | 076985544224 |
| | Email | paul@waiman-bookbinding.com |
| Applicable business and other legally required business license numbers and documents | Business license No.: 91441900752066811B Valid Date: 10th July 2003 to long term | |

[← Management systems](#)

[Worker analysis →](#)

Site activities

| | | |
|--|---|--|
| Site function | Factory Processing/Manufacturer | |
| Site activities | Primary Printing Secondary Other | |
| Product type | Books, desk calendars, wall calendars, gift boxes, hand-held bags, etc. | |
| Process overview | Cutting, die-cutting, printing, UV printing, screen printing, laminating, foil stamping, casing-in, bookbinding, book folding, threading, adhesive binding and packing. | |
| 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? | <p>No</p> <p>In view of the facilities, the audited facility used one 8-storey production building, the whole 1/F of one 7-storey production building as production floors, warehouse and office; two 6-storey buildings as dormitory, canteen and kitchen. The occupied area of this facility was about 37043 square meters. And the rest of one 7-storey production building were occupied by other facilities. As per facility management and on-site observation, the audited facility and other facilities belong to different bosses and had separate business license and management system. And the lease contract indicated that the audited facility only rents the 1/F of one 7-storey production building. As per employee interview and management interview, they had separate management system and payroll recording system and no employee comingling took place. Hence, the areas used by other facilities were not covered in the audit scope.</p> |
|--|---|

Site scope

| | | |
|-------------------|---|--|
| Building 1 | Last construction works on site | 2024 |
| | If building is shared, provide details | N/A |
| | Number of floors | 8 |
| | Description of floor activities | Floor 1: cutting and printing; Floor 2: adhesive binding, printing, foil stamping, die-cutting, UV printing and Laminating, screen printing; Floor 3: binding, book folding and threading; Floor 4: adhesive binding; Floor 5: handwork and packing; Floor 6: finished goods warehouse; Floor 7: raw materials warehouse; Floor 8: office. |
| Building 2 | Last construction works on site | 2024 |
| | If building is shared, provide details | Yes. In view of the facilities, the audited facility used whole 1/F of this one 7-storey production building as production floors and warehouse. And the rest of this production building were occupied by other facilities. |
| | Number of floors | 7 |
| | Description of floor activities | Floor 1: paper sheeting and raw materials warehouse; Floor 2 to 7: other facilities. |
| Building 3 | Last construction works on site | 2024 |
| | If building is shared, provide details | N/A |
| | Number of floors | 6 |
| | Description of floor activities | Floor 1: kitchen and canteen; Floor 2 to 6: bedrooms. |

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[Worker analysis →](#)

Site scope

| | | |
|--|--|---|
| Building 4 | Last construction works on site | 2024 |
| | If building is shared, provide details | N/A |
| | Number of floors | 6 |
| | Description of floor activities | Floor 1: canteen; Floor 2 to 6: bedrooms. |
| Building 5 | Last construction works on site | 2024 |
| | If building is shared, provide details | N/A |
| | Number of floors | 1 |
| | Description of floor activities | Guard station |
| Is there any difference between the site scope of the audit and the Sedex site profile? | No | |
| Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? | No | |
| Is any activity conducted onsite not included within the scope of the audit? | No | |

Worker accommodation and transport

| | |
|--|--------|
| Are there any site-provided worker accommodation buildings? | Yes |
| Is the accommodation within the perimeter of the site audited? | Onsite |

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[Worker analysis →](#)

Worker accommodation and transport

| | |
|--|--|
| 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 Two 6-storey buildings were used as dormitory, kitchen and canteen for employees. |
| Does the site organise worker transport to the worksite? | Not provided Workers arrange their own transport. |

Work patterns

| | | | | |
|---|-----------|---------|----------|---------|
| Approximate workers on site per month (% of peak) | January | 90-95% | February | 90-95% |
| | March | 95-100% | April | 95-100% |
| | May | 95-100% | June | 95-100% |
| | July | 95-100% | August | 95-100% |
| | September | 95-100% | October | 95-100% |
| | November | 95-100% | December | 95-100% |

| | |
|--|--|
| Is there any night shift work at the site? | Yes The 2nd shift of printing, bookbinding and adhesive binding departments was 20:45-23:15 and 23:45-05:15 of next day or 21:00-23:30 and 24:00-05:30 of next day. |
|--|--|

| | |
|--|----|
| What percentage of the workforce, including temporary and agency workers, work during the night shift? | 4% |
|--|----|

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Work patterns

| | |
|---|--|
| 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? | <p>Yes</p> <p>Night Shift Audit was conducted on 4th November 2025 for this facility, which lasted from 21:00 to 23:00. Auditor conducted walkthrough, document review and employees' interviews during this period, total 10 night shift employees were interviewed and attendance records, payroll records, personal files and labor contracts of 10 night shift employees were selected for review, and no obvious NC was found during Night Shift Audit.</p> |
|---|--|

Site assessments

| | |
|--|--|
| Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? | <p>ISO 14001 (Environmental management), Other certification</p> <p>FSC certificate with valid date from 24th September 2023 to 23rd September 2028.</p> |
| 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? | <p>Yes</p> <p>The site had been assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.</p> |
| Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? | <p>No</p> <p>Human Rights Impact Assessment (HRIA) was not conducted within the last three years at this site.</p> |

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Worker analysis

Gender disaggregated data available Men and women

Worker totals

| | Men | Women | Other | Total |
|-------------------|-------------|-------------|-------|------------|
| Number of workers | 237 (53.6%) | 205 (46.4%) | - - | 442 (100%) |

Workers by type

| | Men | Women | Other | Total |
|---|-------------|-------------|-------|------------|
| Permanent workers (employees) | 237 (53.6%) | 205 (46.4%) | - - | 442 (100%) |
| Temporary or fixed term employees | 0 - | 0 - | - - | 0 (0%) |
| Agency or subcontracted workers | 0 - | 0 - | - - | 0 (0%) |
| Seasonal workers | 0 - | 0 - | - - | 0 (0%) |
| Self-employed workers | 0 - | 0 - | - - | 0 (0%) |
| Informal workers including home workers | 0 - | 0 - | - - | 0 (0%) |
| Apprentices, trainees or interns | 0 - | 0 - | - - | 0 (0%) |

* % of total workforce

[← Site details](#)

[Worker interviews →](#)

Migrant workers

| | Men | Women | Other | Total |
|-------------------------------|-------------|-------------|-------|-------------|
| Domestic migrant workers | 205 (56.6%) | 157 (43.4%) | - - | 362 (81.9%) |
| International migrant workers | 0 - | 0 - | - - | 0 (0%) |
| Total migrant workers | 205 (56.6%) | 157 (43.4%) | - - | 362 (81.9%) |

* % of total workforce

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

All migrants were domestic migrant employees from Sichuan, Guangxi, Jiangxi, Henan, Hunan, Guizhou and Yunnan provinces of China.

Workers by age

| | Men | Women | Other | Total |
|--------------------|------------|-----------|-------|---------|
| 18 - 24 years old | 13 (59.1%) | 9 (40.9%) | - - | 22 (5%) |
| 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 N/A, the peak season was not obvious in the facility.

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 | 54% | 46% | - | 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 | 237 (53.6%) | 205 (46.4%) | - - | 442 (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 | 237 (53.6%) | 205 (46.4%) | - - | 442 (100%) |
| Other | 0 - | 0 - | - - | 0 (0%) |

* % of total workforce

If other payment cycle entered, please provide details N/A. There was no other payment cycle used in this facility.

People in managerial, supervisory and administrative roles

| | Men | Women | Other | Total |
|--|------------|------------|-------|-------|
| Employees in management positions | 0 (0%) | 1 (100%) | - - | 1 |
| Supervisors or team leaders | 37 (56.1%) | 29 (43.9%) | - - | 66 |
| Administrative staff | 7 (25.9%) | 20 (74.1%) | - - | 27 |

[← 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 6 groups of 5 employees.

Did workers understand the purpose of the audit? Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers? Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

What was the general attitude of the workers towards their workplace?

Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

No concern or complaint was raised.

What did the workers like the most about working at this site?

- Accommodation standards
- Communication (e.g. from management)
- Equal opportunities
- Freedom of movement
- Grievance mechanisms
- Hours worked, rest days or breaks
- Overtime
- Pay
- Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)
- Training and development

Attitude of workers

Additional comments

42 employees were randomly selected for interview including 22 male employees and 20 female employees, they were interviewed as 6 groups of 5 employees and the balance of 12 employees were interviewed individually. Through employees' interviews, it was noted that all employees were satisfied with the facility and no negative information was raised. The employees were assured of confidentiality and they spoke freely of their views of the facility. All employees said they were satisfied with their employment at the facility 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 facility and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their managers and supervisors through worker representatives, suggestion box, phone calls, etc., and sometimes they had seen these suggestions used. The facility had provided training about environment protection and ethics issues to them.

Remark: During this audit, two employee and management for environment and ethics management were interviewed additionally and those information was not covered in the interview table.

Attitude of workers' committee/union representatives

One worker representative was selected for interview, who was favorable with the management and facility environment and no negative information was raised.

Attitude of managers

The management was cooperative throughout the process of the audit. The documentations requested were provided for review timely. All areas were allowed access for tour, and a private room was provided for employees' interview. During closing meeting, the managements were receptive to all findings and stated that they would make improvement for all raised findings continually.

Workers interviewed by type

| | Total |
|-----------------------------------|-------|
| Permanent workers | 42 |
| Temporary or fixed-term employees | 0 |

Workers interviewed by type

| | |
|--|-----------|
| Agency or subcontracted workers | 0 |
| Seasonal workers | 0 |
| Other workers | 0 |
| Total number of workers interviewed | 42 |

Workers interviewed by group/individual

| | Men | Women | Other | Total |
|----------------------------------|-----|-------|-------|-------|
| Workers interviewed in groups | 14 | 16 | - | 30 |
| Workers interviewed individually | 8 | 4 | - | 12 |

Migrant workers interviewed

| | Men | Women | Other | Total |
|---|-----------|-----------|----------|-----------|
| Domestic migrant workers interviewed | 17 | 16 | - | 33 |
| International migrant workers interviewed | 0 | 0 | - | 0 |
| Total migrant workers interviewed | 17 | 16 | - | 33 |

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

| | Men | Women | Other | Total |
|------------------------------------|------|-------|-------|-------|
| Last full quarter (90 days) | 1.6% | 1.0% | - | 2.6% |
| Last full calendar year (2024) | 5.0% | 4.5% | - | 9.5% |
| Previous full calendar year (2023) | 5.9% | 3.2% | - | 9.1% |

* 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) | 4.0% | 3.2% | - | 7.2% |
| Last full calendar year (2024) | 5.0% | 5.2% | - | 10.2% |
| Previous full calendar year (2023) | 4.9% | 4.8% | - | 9.7% |

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

Are accidents recorded?

Yes

Management had kept a record of accidents. And the injury root cause would be analyzed and injured employee would be provided with rest, cure and compensate once injury occurred.

[← Worker interviews](#)

[Code area 0 →](#)

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

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

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 | <p>Current Systems:</p> <ol style="list-style-type: none"> 1. Auditor was allowed to conduct and complete the audit without obstruction to all requested documents, interviewees and the facility itself and the facility provided genuine and authentic records to the auditor. 2. The facility did not offer bribes or threaten to the auditor, nor in any way induce the auditor to be dishonest. 3. The facility provided an accurate site description and Sedex site profile declared prior to or during the audit. 4. The facility maintained a written human rights policy statement that was approved at the most senior level, communicated to all personnel, and related training was provided to relevant personnel. 5. There were two shifts for printing, bookbinding and adhesive binding departments, the 1st shift was 07:45-11:45 and 13:15-17:15 or 08:00-12:00 and 13:30-17:30; the 2nd shift was 20:45-23:15 and 23:45-05:15 of next day or 21:00-23:30 and 24:00-05:30 of next day. Night Shift Audit was conducted on 4th November 2025 for this facility, which lasted from 21:00 to 23:00. Auditor conducted walkthrough, document review and employees' interviews during this period, total 10 night shift employees were interviewed and attendance records, payroll records, personal files and labor contracts of 10 night shift employees were selected for review, and no obvious NC was found during Night Shift Audit. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Health and safety manual 2. Personal files including a copy of employee's contract 3. Payroll records 4. Attendance records 5. Management interview and employee interview | | |

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility had established a series of policies on forced labor, human trafficking, debt slavery, or any other form of modern slavery which stated that the facility did not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; the facility prohibits forced, bonded or involuntary prison labour; and employees are free to leave their employer after reasonable notice, etc.
- All policy and procedure serves as a guiding principle for all employment practices within the facility and these policies and procedures were reviewed and updated annually.
- The facility would update the policy and procedures if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- The facility appointed Mr. Wang Shangping / HR Supervisor to be responsible for communicating, deploying, and monitoring the practices of effectively prohibiting involuntary or forced labour. He was aware of the responsibilities. He had the necessary skills and seniority to manage this issue.
- However, the facility did not appoint backup person in case of position change or absence to ensure long-term compliance in the future.

3. Communication and Training:

- There was one written training program at site. The facility provided effective training and communication on the policy of prohibiting forced, bonded and prison labour and the recruitment procedure to all relevant employees, including the managers, supervisors, administration staff and normal production employees.
- Special training was provided for employees in key positions and all related employees have engaged in the training in time.
- The facility incorporates relevant training into its operations and the training materials and contents are updated if needed.
- Training records were kept for review, and through employee interview, all employees had clear understanding of the policies and procedures.

4. Monitoring:

- The facility effectively monitors the facility recruitment process in accordance with the policies and procedures and had established systems and methods for identifying and preventing modern slavery or human trafficking .
- The policy requires the Human Resources Department to conduct training quarterly for HR employees to enhance recruiters' awareness of forced labor, human trafficking, debt slavery, or any other form of modern slavery, and the training record should be maintain.

Management systems

- Management would conduct meets regularly and proactively to improve issues arising from the recruitment process to preventing forced labor, human trafficking, debt slavery, or any other form of modern slavery and maintaining transparency in its employment practices to ensures sustainable compliance with all workplace requirement in this code area now.

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 facility had a written policy of prohibiting forced, bonded and prison labour. The policy stated that the facility did not require deposit or withhold workers' ID cards; the facility did not limit the workers' freedom; the facility prohibited forced, bonded or involuntary prison labour; and workers were free to leave their employer after reasonable notice, etc.
2. The facility had a written recruitment procedure which stated that the workers must present their ID cards for proof of age but only copies would be kept in the personnel files and the original ID cards would be given back to the workers.
3. The employee handbook was given to all workers on joining, stated that workers were free to leave with 3 days' prior written notice within their probation period and can resign with one month's prior written notice after the probation period; the resigned workers would be given their full wages on their last day of work; according to the onsite observation and worker interviews, the workers were free to leave the workplace after their working hours every day; the overtime was voluntary, etc.
4. The rules for security guards stated that the responsibilities of security guards were only protecting the safety of the facility's personnel and properties, and security guards were not allowed to abuse workers and conduct body search.

Evidence examined

1. Policy of prohibiting forced, bonded and prison labour
2. Recruitment procedure
3. Employee handbook
4. Personnel files and labour contracts
5. Resignation records
6. Rules for security guards
7. Onsite observation, management and worker interview

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

1.A. Responsible recruitment and entitlement to work

Management systems

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility had established a well-documented policies and procedures regarding responsible recruitment and entitlement to work. This policy stipulated that the facility only employed individuals who possessed the legal right to work, ensuring compliance with local labor laws and regulations.
- The policy procedure detailed the facility's rules about the nature of work, working conditions, living conditions, employment terms, living costs, wages and benefits, and stated that any recruitment fee was prohibited in the facility.
- The facility did not use labour providers/ on-site subcontractors agencies/recruitment partners in current. But according to the policies and procedures, the labour providers or on-site service subcontractors should follow the same requirements to ensure responsible recruitment and entitlement to work.
- The facility would update the polices and procedures if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- Based on the appointment documents, Mr. Wang Shangping / HR Supervisor had been appointed to oversee and implement the recruitment procedure covering the content of responsible recruitment and entitlement to work. He was aware of his responsibilities and regularly trains HR employees to raise their awareness of recruitment fee monthly.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- There was a training plan in place and the facility followed it in practice which include entitlement to work and recruitment practices.
- The facility would ensure all stakeholders are aware of the facility's policies and the importance of adhering to legal requirements for employment.
- Special training was provided for employees in key positions and all related employees have engaged in the training in time.
- The facility incorporates relevant training into its operations and the training materials and contents are updated if needed.

4. Monitoring:

- The facility monitored the effectiveness of Responsible recruitment and entitlement to work procedures through internal audit and management review.
- The working conditions, living conditions, employment terms, living costs, wages and benefits in the facility accurately reflect those communicated to employee during

[← Code area 1](#)

[Code area 2 →](#)

Management systems

recruitment and communicated to employees regularly to increase their awareness.

- The facility conducted the internal social compliance audit once per year, which covered the subject of the responsible recruitment and entitlement to work, and the results were reviewed and acted upon by management. The responsible recruitment and entitlement to work requirements were implemented and controlled effectively which could ensures sustainable compliance with all workplace requirement in this code area now.

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. Per document review, facility management representation and employee interview, all employees in the facility were Chinese, all employees had the proper legal rights to work in this region. The youngest age was 18 years old. All of them were recruited directly by the facility and no agency was involved in facility's recruitment processes.
2. No agency staff or foreign employee was used by the facility.
3. The facility did not use any labour providers or on-site subcontractors. The facility had a written policy of recruitment and entitlement to work, the policy stated that the hold labour providers and on-site subcontractors contractually responsible to ensure no recruitment fees or related costs are incurred or charged to workers and specifies the responsible party for reimbursing workers accordingly if they incur fees or costs. If workers who are found to pay recruitment fees or related costs (legal or otherwise, as defined by the ILO and including travel and visa costs), are fully reimbursed in a timely manner and should sign a agreements with labour providers or on-site subcontractors included sufficient protections for children and young workers.
4. The facility had established policy to avoid profiting from forced labour, human trafficking, debt bondage/ bonded labour or any other form of modern slavery. And systems in place to identify and prevent various forms of modern slavery or human trafficking within third parties.
5. The facility had established a system to validate that workers have a right to work.
6. There was a total of 536 employees including 1 management employee and 535 nonmanagement employees, 255 females and 281 males working in the audited facility at present. 98 (18%) employees were local workers from Guangdong, 438(82%) employees were domestic migrant workers from Sichuan, Guangxi, Jiangxi, Henan, Hunan, Guizhou and Yunnan. No foreign migrant workers.
7. There were 129 newly hired employees in the last 12 months. At the same time, 438 migrant workers were found in the facility. No foreign migrant worker was used by the facility. The facility had conducted due diligence regarding recruitment fees and related costs, no recruitment fees or related costs were observed.

Evidence examined:

1. Hiring procedure.
2. Personnel files with labour contracts and ID copies.
3. Employing handbook.
4. Facility tour.
5. Management interview and worker interview.

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 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? Yes

List the sending states/provinces/regions All migrants were domestic migrant employees from Sichuan, Guangxi, Jiangxi, Henan, Hunan, Guizhou and Yunnan provinces of China.

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

No recruitment fees or costs were observed during employees' interview.

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- A policy and procedure concerning freedom of association and the right to collective bargaining was in place and the responsibilities and processes to implement policies and procedures are clear.
- The policy stated that the employees were free to form or join workers' organization and enjoy the right to collective bargaining, and nobody would be treated differently if they were members of workers' organisation, etc.
- This policy was updated regularly and signed by General Manager and posted on the employee notice board.

2. Resources:

- The facility assigned Mr. Wang Shangping / HR Supervisor to be responsible for implementing the procedure of free association, and he was aware of his responsibilities. He had the necessary skills and seniority to manage this issue.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The facility communicated its policies and practices pertaining to freedom of association to all employees through comprehensive training programs.
- This included new employee orientation training, where employees were introduced to their rights and responsibilities related to freedom of association, as well as refresh training for existing employees to keep them informed and engaged.
- Training records were kept for review, and through employee interview, all employees had clear understanding of the policies and procedures.

4. Monitoring:

- The facility provided multiple avenues for employees to freely communicate issues related to working conditions, wages and benefits, and freedom of association directly to management. This included regular meetings with top management, where employees could voice their concerns and suggestions, as well as a suggestion box where employees could submit their documented issues anonymously.
- Mr. Wang Shangping / HR Supervisor monitors the freedom of association and help worker representatives to conduct meetings when it was necessary.
- The facility reviewed and updated the policy and procedures regularly to ensure they continue to achieve the desired result and to ensure ongoing conformance as standards change.

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|--|---|------------|---------|
| Systems and evidence examined to validate this code section | <p data-bbox="730 568 863 600">No findings</p> <p data-bbox="555 703 751 734">Current systems:</p> <ol data-bbox="555 741 1533 1442" style="list-style-type: none"> <li data-bbox="555 741 1533 920">1. The facility had a written policy of freedom of association and right to collective bargaining. The policy stated that the workers were free to form or join trade union or workers' organization and enjoyed the right to collective bargaining, and nobody would be treated differently if they were members of the trade union or workers' organization, etc. <li data-bbox="555 927 1533 1070">2. The facility had a written policy about suggestions and appeals, which stated that workers could raise their suggestions, concerns or appeals through EHS committee representatives, telephone, suggestion box, and their team leaders or above; or through worker representatives who would take it to the management. <li data-bbox="555 1077 1533 1220">3. There was one worker committee with 6 worker representatives in the facility. The worker representatives conducted meetings quarterly and the latest meeting was conducted on 30th September 2025. One worker representative was present at the opening meeting, the audit and the closing meeting. <li data-bbox="555 1227 1533 1294">4. The interviewed workers confirmed that they were free to join workers' organization and enjoyed the right to collective bargaining. <li data-bbox="555 1301 1533 1368">5. The interviewed worker representative confirmed that the facility did not interfere in their activities and did not discriminate them. <li data-bbox="555 1375 1533 1442">6. The response records for workers' suggestions and appeals were available for review. <p data-bbox="555 1487 783 1518">Evidence examined:</p> <ol data-bbox="555 1525 1358 1713" style="list-style-type: none"> <li data-bbox="555 1525 1326 1556">1. Policy of freedom of association and right to collective bargaining <li data-bbox="555 1563 1015 1594">2. Policy about suggestions and appeals <li data-bbox="555 1601 1302 1632">3. Worker representatives' selection records and meeting records <li data-bbox="555 1639 1222 1671">4. Response records for workers' suggestions and appeals <li data-bbox="555 1677 1358 1709">5. Interviews with worker representative, management and employees | | |

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

Data points

| | |
|---|----------------|
| Are trade unions allowed by law in the national context? | Yes |
| Are there any registered trade unions in the workplace? | No |
| Are they active? | |
| Does the employer recognise the trade union? | Not Applicable |
| Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)? | Yes |
| Are the worker representatives freely elected by the workforce as a whole? | Yes |
| Does union/worker committee membership reflect the gender composition of the workforce? | Yes |
| Does the membership reflect the nationality composition of the workforce? | Yes |
| Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years? | No |

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility has declared an EHS procedure and policy supported at the highest level that includes of emergency preparedness procedure, Fire management control procedures, equipment management procedures, health and safety management procedures, first aid procedures, chemical management procedures, accident management procedures and etc. outlining the commitment to maintaining a safe and healthy work environment for all employees.
- The policy is reviewed regularly by the Health and Safety Committee and signed by General Manager and controlled by the quality management system procedure.
- All policies and procedures in place were in compliance with all of the workplace requirements within the Code Area. No gaps in policies and procedures was observed.

2. Resources:

- Based on the established EHS procedure, the General Manager leading the Health and Safety Committee, has been appointed to oversee and implement the Health and Safety Policy.
- The General Manager arranged an EHS meeting once every two months with the presence of the Health and Safety Committee and supervisors of each department to address HS concerns and provide updates.
- However, the responsibilities of line leaders were not written, and no written procedure was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The facility provides employees with training related to health and safety, such as building safety, fire safety, electrical safety, machine safety, working at height, (hazardous/non-hazardous) chemical safety handle & disposal and PPE usage which the facility incorporates into its operations to ensure employees are aware of their safety concerns.
- All training was based on the risks on the site, especially training on fire protection and employee safety. The training record was kept and could contribute to a culture of compliance and awareness within the facility.
- However, the training need enhancement for isolated training topic i.e. chemical safety management procedures.

4. Monitoring:

- Mr. Gao Zhanwei / Safety Director supervised the production health and safety, and the workshop leaders were responsible for the specific implementation.
- The EHS Committee which consisted of members from different departments carried out comprehensive inspections monthly, and conducted the meeting to talk

Management systems

about the health and safety topics at least once every 2 months.

- The facility manager and the department leaders cooperated and participated to ensure the health and safety of the production site.
- The facility conducted the risk assessment regularly to consider the prevailing knowledge of the industry and of any specific hazards. The facility took adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work.
- The facility conducted the internal social compliance audit, which covered the subject of health and safety; the facility would take correct action immediately if any health and safety violations found after the internal audit, and the relevant records for corrective and preventative action were provided for review.
- However, gaps in monitoring of chemical safety managements were observed, that did not ensure sufficient management of workplace requirements on an ongoing basis.

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|---|--|------------------------|---------------------------------|
| 3. Working conditions are safe and hygienic | 3.N Ensure that all hazardous substances (e.g... | Local law Base code | NC ZAF601180142 |

Systems and evidence examined to validate this code section

Current systems:

1. General Health and Safety management

- Mr. Gao Zhanwei / Safety Director was responsible for the Health & Safety management in the facility.
- Potable water was freely available in all areas.
- Sufficient clean toilets segregated by gender were available at all times to employees.
- Ventilation, temperature and lighting were adequate for the production processes.
- Minutes of meetings showed that there were meetings between the H&S committee (workers) and the H&S manager every two months, and each point is acted on.
- The facility conducted occupational hazardous factors testing annually and provided occupational health examination for employees as required.

2. Fire Safety

- There were at least 2 exits from each work area and these exits were clearly marked.
- Firefighting equipment was adequate, and the checks were up-to-date.
- Evacuation plans were posted in all areas and understood by all employees interviewed.
- Fire drills were conducted twice per year.
- Fire training was provided to all employees.
- Fire alarm, fire hydrant and fire extinguishers were installed at production building.
- All fire exits were unlocked during work time.

3. Electrical safety

- All electrical equipment was maintained in good condition such as sockets, plugs, switches and main fuse boards.
- Valid electrician license was provided for review.

4. Medical services

- There were adequate first aid kits in each production area and they were well stocked.
- There were sufficient first aid personnel in this facility.

5. Machine safety

- All production machines were inspected on a regular basis.
- Proper safety guard was installed for all production machines.

6. Chemical safety

- MSDS was available for all chemicals used and stored on-site.
- Safety label was available for most chemicals used and stored on-site.
- Secondary container was available for all chemicals used and stored on-site, and eye washing facility was available for all chemicals used and stored areas.

7. Dormitory, kitchen and canteen

- The dormitory, canteen and kitchen were well maintained, and the food operation permit and health certificate of cooker were provided for review.
- The facility provided sufficient fire safety equipment such as extinguishers, fire

hydrants, fire alarms and evacuation maps in the dormitory, canteen and kitchen, all were well equipped and checked monthly.

- All exit doors were installed with safety exit signs and emergency lights. At least two emergency exits were on each floor in the dormitory, canteen and kitchen.
- There were adequate first aid kits with sufficient supplies in the dormitory, canteen and kitchen.

Evidence examined:

1. Health and safety policy
2. Health and safety manual
3. Appointment document for the Health and Safety Supervisor
4. Health and safety committee minutes
5. Potable water testing report
6. Toilet cleaning records
7. Temperature recording sheets
8. Accident reports
9. Fire certificate
10. Fire prevention facilities' monthly maintenance and inspection records
11. Fire drill records
12. The certificate of the electrician
13. PPE issuing and receiving records
14. Trained first aiders' certificates
15. Onsite observation
16. Interviews with Health and Safety Officer
17. Interviews with workers and H&S committee members

Findings: non-compliances

ZAF601180142

Non-compliance

Due 2025-12-13

Code area

3 Working conditions are safe and hygienic

Status

Closed (2025-12-03)*

Workplace requirement

3.N Ensure that all hazardous substances (e.g. chemicals and pesticides) are officially registered where possible, Material Safety Data Sheets are used, and they are managed appropriately at all times in line with registration and safety instructions, including storage, use and disposal.

Time given to resolve

30 days

Issue title

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

Verification method

Desktop audit

Description

No safety label for hazardous chemical. During facility tour, auditor found that there was no label 6 barrels of thinner using at screen printing workshop on the 2/F of one 8-storey production building.

Area of non-compliance/non-conformance

Local law

Base code

危险化学品没有安全标识。在现场巡查时，审核员发现在1栋8层生产楼2楼丝印车间使用的6桶稀释剂没有安全标识。

Corrective and preventative actions

It was due to the negligence in on-site management.

The facility would provide safety label for these chemicals as soon as possible and enhance on-site monitoring.

Local law reference

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

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[No safety label for hazardous chemical.jpg](#)

* PDF generated at 07:26 (UTC) on 03 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

[← Code area 3](#)

[Code area 4 →](#)

3. Working conditions are safe and hygienic

Data points

| | |
|---|--|
| Is someone within the company responsible for health and safety? | Yes, senior manager or business owner Yes, qualified safety officer |
| Do workers operate high risk or heavy machinery or vehicles as part of their jobs? | No |
| Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)? | Yes Chemicals such as machine oil, thinner and print ink were used in the facility. |
| Who organises accommodation for workers? | The company owns or operates worker accommodation (onsite) |
| Who organises worker transportation between accommodation and worksite? | Workers organise their own transport |
| Who organises worker transportation while at work? | Workers organise their own transport |
| Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law? | Not Applicable No structural addition was found during this audit. |
| Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building? | No |
| Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally? | No |

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- A written recruitment policy included provision for non-employee (agency) workers was in place which outlines the key mechanisms in place for preventing underage work and the placement of young workers in unsuitable positions and explicitly stating that all workers must present their ID cards as proof of age during the hiring process. This policy ensures compliance with regulations prohibiting the employment of individuals under the age of 16.
- A juvenile employee protection procedure was documented, outlining measures to safeguard the rights and well-being of young workers, further reinforcing the commitment to not employ child labor.
- There was a written pregnant employee protection procedure although there was no pregnant employee in the facility.
- A child labor remediation procedure was also documented, demonstrating preparedness to address any potential issues promptly and effectively.
- The facility would update the policy and procedures if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- Mr. Wang Shangping / HR Supervisor was named within recruitment policy as ultimately responsible for ensuring its resourcing, approval and regular review.
- Mr. Wang Shangping / HR Supervisor was assigned to oversee the implementation of the recruitment procedure covering the requirement of prohibition of using child labor, the juvenile worker and pregnant worker protection procedure and the child labour remediation procedure.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The facility provided effective training and communication on the recruitment procedure covering the requirement of prohibition of using child labor, the juvenile worker and pregnant worker protection procedure and the child labour remediation procedure to all relevant workers, including the managers, supervisors, administration staff and normal production workers etc.
- Through reviewed the training record, it was noted that the training content was updated according to need.
- Training records were kept for review, and through employee interview, all employees had clear understanding of the policies and procedures.

4. Monitoring:

[← Code area 3](#)

[Code area 5 →](#)

Management systems

- Responsibilities for monitoring implementation of age-verification are defined by the Hiring Procedure.
- The procedure requires that audit of the records kept of this verification is conducted by Mr. Wang Shangping / HR Supervisor, increasing to weekly at times of peak hiring. Records are kept of monitoring activities.
- Any identification of mis-application of procedures, or concerns about application are escalated for action in the monthly HR team meeting. For example, young workers should not be discriminated against by denying them access to the workforce, but their specific needs should be taken into account to ensure they are undertaking appropriate work, this was highlighted by internal monitoring and re-training rolled out for key staff.
- Managers conduct an annual risk assessment for young workers with corrective and preventive actions to ensure long-term compliance in the future.

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. There was a written recruitment procedure which stated that workers must present their ID cards for proof of age but only copies would be kept in the personnel files and the original ID cards would be given back to the workers; and the facility would never employ and use any child labour under the age of 16 years old.
2. There was a written juvenile worker and pregnant worker protection procedure although there was no juvenile worker or pregnant worker in the facility.
3. There was a written child labour remediation procedure though there was no child labour in the facility.
4. The written worker roster was available.
5. The worker' personnel files included recruitment date, a bio-data sheet, a recent photo and the age documentation (i.e. copy of the ID card). The ID card copy listed the worker's name, household address and the date of birth. The workers' personnel files showed that the youngest worker was 18 years old.
6. Management interview and worker interviews showed that the facility verified all workers' original ID cards at the time of recruitment and kept the photocopies of workers' ID cards in the personnel files, and the facility would not recruit the applicant under the age of 16 years old.

Evidence examined:

1. Recruitment procedure
2. Juvenile worker and pregnant worker protection procedure
3. Child labour remediation procedure
4. Worker roster
5. Personnel files
6. Management interview and worker interview

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger 4%

Enter the legal age of employment 16

Enter the age of the youngest worker identified 18

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 | Some Improvements Recommended |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility established and implemented the wage & benefit policy and controlling procedure, which stipulated how to calculate, how to pay and when to pay the wages including overtime wage, benefits, bonus and leaves to the workers and what deduction will be deducted from the workers' wages; and stated that the wages and benefits should meet the legal requirements and be paid on time for the workers.
- These policies and procedures were reviewed and updated annually to ensure they remained relevant and effective in mitigating risks.
- The facility will update the policy and procedures if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- The General Manager designated Ms. Mo Guiling / HR leader to implement of the policy of the wage & benefit policy and controlling procedure.
- Ms. Mo Guiling / HR leader had the authority to implement the processes and she was clear about the wage and benefits policies and had the necessary skills and seniority to manage workplace requirements.
- However, through the analysis of structure, apart from Ms. Mo Guiling / HR leader, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- Regular trainings on the wage & benefit policy and controlling procedure was provided to all relevant workers, including the managers, supervisors, administration staff and normal production workers etc.
- The training was conducted according to a set plan, the training content was updated and there was an effective assessment of understanding for those employees receiving training.
- The relevant policies and procedures were written in the local language (i.e. Chinese) and posted in the notice boards to let the employees view anytime.

4. Monitoring:

- The facility monitored the implementation of procedures put in place to ensure ongoing compliance.
- The facility had conducted internal assessment and management review for this code area and most legal requirements about wages and benefits were implemented adequately.
- No gap in monitoring of procedures was noted during this audit. The facility had also established appropriate correction and preventative procedure to ensure long term compliance.

[← Code area 4](#)

[Code area 5.A →](#)

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|-------------|-----------------------|------------|---------|
| No findings | | | |

[← Code area 4](#)

[Code area 5.A →](#)

Systems and evidence examined to validate this code section

Current systems:

1. Wage & benefit policy and controlling procedure were established and implemented.
2. Wage & benefit policy and controlling procedure were communicated to the workers through regular trainings.
3. The local Minimum wage was set RMB 2080 per month equivalent to RMB 11.95 (2080/21.75/8) since 1st March 2025 and at RMB 1900 per month equivalent to RMB 10.92 (1900/21.75/8) before 1st March 2025. The current month was September 2025 and the basic wage of all employees was set at RMB 11.95 per hour, which was equal to the legal requirement.
4. Wages and attendance records were kept and provided for review.
5. Per the Wage & benefit policy and controlling procedure, the provided attendance records, payrolls, and worker interviews, it was confirmed that 1) All employees' wages were calculated by hourly rate. The minimum wage paid by the facility was RMB 11.95 per hour, which was equal to the legal requirement. 2) Based on the provided payroll records, the facility paid 150% of the normal wages for the extension of working hours on normal days, paid 200% of the normal wages for the extended hours on rest days and paid 300% of the normal wages for overtime work on statutory holidays.
6. All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time that they were paid.
7. Benefits such as annual leave, sick leave, marriage leave, funeral leave, stoppage leave, paternity leave and child-bearing leave etc. were provided to relevant workers adequately.
8. All employees had participated in basic endowment insurance, unemployment insurance, maternity insurance, basic medical insurance and employment injury insurance.
9. The social insurance payments were passed on to the relevant authorities in a timely manner.
10. The workers' wages including normal wages and overtime wages etc. of one month was paid on or before the 30th days of the following month.
11. All workers were paid through bank transfer, and each worker was given a pay slip and signed for their wages.
12. No monetary fine was used as disciplinary measure.
13. No inconsistency regarding the workers' wages and working time was found between the payrolls, the attendance records, the production related records and worker interviews, etc.
14. Wages consisted of normal wage, holiday wage, overtime wage and position bonus.

Evidence examined:

1. Wage & benefit policy and controlling procedure
2. Training records about wage and benefit policy and controlling procedure
3. Local legal minimum wage documents
4. Local and national laws
5. Labour contracts for all workers (to examine agreed wage rates)
6. Payroll records from October 2024 to September 2025 and attendance records from 1st October 2024 to 6th November 2025 (the audit day) were available for review.
7. Social insurance payment receipts from the local authority
8. Leave records
9. Resignation records
10. Disciplinary records
11. Production records such as daily production quantity records, inspection records and material receiving and issuing records were reviewed and consistent with the attendance records and payrolls provided.
12. Worker interview and management interview

5. Legal wages are paid

Data points

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

Worker remuneration

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

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 | 176.0 |
| 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 | 12.0 |
| | Max hours per month | 35.5 |
| Minimum legal wage | Min per hour | 11.95 |
| | Min per day | Non applicable |
| | Min per week | Non applicable |
| | Min per month | 2080.0 |
| Actual minimum wage | Actual per hour | 11.95 |
| | Actual per day | 95.63 |
| | Actual per week | 478.16 |
| | Actual per month | 2080.0 |
| Minimum legal overtime wage | Min per hour | 17.93 |
| | 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 | 17.93 |
| | Actual per day | Non applicable |
| | Actual per week | Non applicable |
| | Actual per month | Non applicable |

Wage analysis

| | |
|---|--|
| Number of workers' records checked | 42 |
| Provide the date and details of the records | 42 samples from September 2025 (current month); 42 samples from May 2025 (random month); 42 samples from December 2024 (random month). |
| Are there different legal minimum/legally recognised CBAs wage grades? | Yes The local Minimum wage was set RMB 2080 per month equivalent to RMB 11.95 (2080/21.75/8) since 1st March 2025 and at RMB 1900 per month equivalent to RMB 10.92 (1900/21.75/8) before 1st March 2025. |
| For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs? | Meets legal minimum |
| Indicate the breakdown of workforce per earnings | 100% of the workforce earning meets legal minimum. |
| Are there any bonus schemes used? | Yes Post bonus: RMB 1050-4000/month. |
| 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 | <p>Current systems:</p> <ol style="list-style-type: none"> 1. The facility had established relevant policies and procedures on living wage. 2. The facility assigned Ms. Mo Guiling / HR leader to be responsible for implementation and she was aware the responsibilities. She had necessary skills and seniority to manage this issue. 3. The facility provided effective training and communication on wage and benefit procedure to all relevant workers, including managers and supervisors. Training content was updated according to need. 4. All employees' wages were calculated on an hourly rated basis. The living wage was calculated under anker reference value methodology for all employees and all employees were paid above the living wage. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Local and national laws 2. Local living wage gap analysis documents 3. Wages and benefits policy 4. Pay stubs 5. Payroll records 6. Employees' interview 7. Management interview | | |

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The working hour policy was clearly mentioned in the "employee handbook", which stipulated that the overtime was voluntary.
- The facility had the working time policy and controlling procedure, which stipulated that the normal working hours were 8 hours per day and 40 hours per week; the weekly working hours should be no more than 60 hours; and one day off per week should be insured for all workers; the working time rules applied for all the employees.
- These policies and procedures were reviewed and updated annually and will be updated if relevant laws and regulations are updated.

2. Resources:

- According to the appointment letter, Mr. Wang Shangping / HR Supervisor was assigned responsibility for implementation the voluntary overtime policy and the working time policy and controlling procedure.
- Mr. Wang Shangping / HR Supervisor understood his role and responsibilities and he had the necessary skills to implement the code area.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- Regular trainings on the voluntary overtime policy and the working time policy and controlling procedure were conducted to all relevant workers, including the managers, supervisors, administration staff and normal production workers etc.
- The facility had provided training records and training evidence for review and auditor can be triangular to confirmed it.
- The relevant policies and procedures were written in the local language (i.e. Chinese) and posted in the notice boards to let the employees view anytime.

4. Monitoring:

- The facility continuously assesses the effectiveness of the working time policy and procedures via regular monitoring and internal audits and takes proactive measures in response to non-compliances.
- The facility carried out a risk assessment of the working hours once a year.
- The management regularly reviews time records to manage overtime and the attendance records were maintained and reviewed regularly to ensure compliance with the working time policy.
- A variety of production and other records were cross-checked for consistency, and no inconsistency about working time was noted.
- No gap in monitoring of procedures was noted during this audit. The facility had also

Management systems

established appropriate correction and preventative procedure to ensure long term compliance.

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. Working time policy and controlling procedure were established and implemented.
2. Voluntary overtime policy was available and overtime was voluntary.
3. Working time policy and controlling procedure were communicated to the workers through regular trainings.
4. Working time was recorded, kept and provided for reviewing.
5. Facial ID system was used for time keeping for employees and the shift start time and shift end time were recorded accordingly.
6. Based on the attendance records provided and payrolls as well as worker interviews, standard normal working hours were 8 hours per day and 40 hours per week; the maximum overtime hour was 35.5 hours a month and 2 hours a day and the maximum weekly working hours was 52 hours a week; at least 1 day off in a week was assured.
7. No inconsistency was found between the payrolls, the attendance records, the production related records and worker interviews, etc.

Evidence examined:

1. Working time policy and controlling procedure
2. Voluntary overtime policy
3. Labour contracts
4. Local and national laws
5. Training records about working time policy and controlling procedure
6. Payroll records from October 2024 to September 2025 and attendance records from 1st October 2024 to 6th November 2025 (the audit day) were available for review.
7. Production records such as daily production quantity records and material receiving and issuing records were reviewed and consistent with the attendance records and payrolls provided.
8. Sampled pay slips with recorded hours of all workers interviewed
9. Worker interview and management interview.

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. Per the wage & benefit policy and controlling procedure, the provided attendance records and payrolls review, and workers interview, the facility paid 150% of the normal wages for the extension of working hours on normal days, paid 200% of the normal wages for the extended hours on rest days and paid 300% of the normal wages for overtime work on statutory holidays. |
| 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? | 47.3 |
| In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site? | 52.0 |
| Maximum number of days worked without a day off in sample | 6 |

[← Code area 6](#)

[Code area 7 →](#)

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Robust Management Systems

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Robust Management Systems

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility has established an anti-discrimination and equity policy and procedure, outlining the organization's commitment to fostering a work environment free from discrimination based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union or workers' organization membership, or political affiliation.
- The responsibilities and processes to implement policies and procedures was clear.
- These policies and procedures were reviewed and updated annually to ensure they remained relevant and effective in mitigating risks.

2. Resources:

- There was a clear responsibility in the management structure or resourcing to implement this code area.
- Mr. Wang Shangping / HR Supervisor and his department are assigned to oversee the implementation of the anti-discrimination policy and procedure. He was clear about ensuring the legal rights of all employees in terms of anti-discrimination and had the seniority to manage the workplace requirements.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- Regular trainings on anti-discrimination and equity approach and mechanisms are provided to employees to ensure that they understand the policy and their responsibilities in creating and maintaining a non discriminatory work environment.
- Through interview with employees, all employees were aware of the principle of nondiscrimination, which showed that the training is effective, and the training content and records was documented and kept for review.
- Through employee interview, all employees had a good understanding on the policies and procedures on anti-discrimination and equity.

4. Monitoring:

- The facility has implemented effective monitoring measures to ensure compliance with the anti-discrimination policy. The facility would take action or make changes to policies and procedures if necessary.
- The facility has an internal grievance process for the employees to report any discrimination cases and all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
- The facility conducted the internal social compliance audit once per year, which covered the subjects of anti-discrimination policy and procedure, and the results were

Management systems

reviewed and acted upon by management. The anti-discrimination policy and procedure were implemented and controlled effectively and ensures sustainable compliance with all Workplace Requirement in this code area now.

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 facility had anti-discrimination and equity policy and procedure;
2. The regular trainings on anti-discrimination and equity were provided to the workers.
3. No worker was required to do the examination of the hepatitis B virus and HIV;
4. No female worker was required to do the examination of pregnant test;
5. Gender discrimination did not exist in the facility; both female and male workers were distributed in all types of work;
6. There was no evidence of sexual harassment;
7. No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union or workers' organisation membership or political affiliation was found;
8. According management and employee interview, all employees got equity approach regarding recruitment, training, development and promotion processes.
9. All interviewed workers spoke highly of the employer;
10. There was an internal grievance process, all sampled workers were aware of the grievance channels in case they encountered any discrimination cases and equity issue.
11. According management and employee interview, all employees got equity approach regarding recruitment, training, development and promotion processes. For instance, 1). Establish a scientific salary system (Determine the value of different positions through job evaluation and formulate reasonable salary standards in combination with the market salary level). 2). Set clear assessment criteria (Define work objectives and assessment indicators to ensure that employees clearly understand how they will be evaluated). 3). Establish a transparent promotion mechanism (Clarify the promotion criteria and procedures, such as requirements in aspects like work performance, ability improvement, and teamwork, so that employees know that promotion is based on their own efforts and abilities). 4). Provide equal training and development opportunities.

Evidence examined:

1. The anti-discrimination and equity policy and procedure;
2. The regular training records on anti-discrimination and equity;
3. The hiring and termination procedure, leave application records and employing handbook.
4. Payrolls records
5. Attendance records
6. Termination records
7. Management interview and worker interview

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 0%

Representation of women in managerial roles (ratio of women workers to women managers) 0%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 14%

Three most common nationalities in managerial and supervisory roles All managerial and supervisory roles were Chinese.

8. Regular employment is provided

Management systems

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility had the recruitment policy and procedure covering regular employment. The recruitment policy and procedure stipulated that the facility would meet and how to meet its contractual and legal obligations in cases of hiring, dismissal, termination and redundancy.
- The facility would use employment labor models and non-employment labor models according to the legal requirements.
- All policies and procedures are appropriate for facility and were reviewed and updated annually to ensure they remained relevant and effective in mitigating risks.

2. Resources:

- A appointment letter was in place to indicate that Mr. Wang Shangping / HR Supervisor had been appointed to oversee and implement the recruitment policy and procedure covering regular employment.
- Mr. Wang Shangping / HR Supervisor had the authority to implement regular employment and he regularly trains HR employees to raise their awareness of recruitment policy and procedure monthly.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The training plan was in place and the facility provides necessary training to newly or current employees to ensure that all employees understand their rights and responsibilities under the labor contracts, as well as the facility's policies regarding recruitment and employment practices.
- Training records were available for review. The interviewed facility management and employees understood of the entire recruitment process and the training was effectively.

4. Monitoring:

- The facility ensured compliance with laws and policies by monitoring employment practices.
- Management would conduct meets regularly and proactively to improve issues arising from the recruitment process to preventing temporary or home workers, and had clear processes for workforce management.
- The facility conducted the internal social compliance audit once per year, which covered the subject of regular employment, and the results were reviewed and acted upon by management to ensure long-term compliance in the future.

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. The employment relationship was legal. The workers were recruited by the facility directly. The facility signed labour contracts with all workers upon hiring and re-signed the labour contracts when the labour contracts expired. All workers received the copies of their labour contracts.
2. The facility complied with obligations to workers arising from the regular employment relationship.
3. The facility had full understanding of the entire recruitment process. The written recruitment policy and procedure were established and implemented in the facility. The facility provided the regular trainings about the recruitment policy and procedure for all workers. The interviewed facility management and workers understood the entire recruitment process.
4. The effective management system was in place to identify and monitor the hiring and management of all workers. The local workers and migrant workers were hired legally and treated equally in the facility.
5. No temporary worker or apprenticeship scheme existed in the facility. No homeworking existed in the facility.
6. Workers were not required to pay any recruitment fee at any stage of the recruitment process, which was confirmed by interviews with management and workers as well as reviewing of the written recruitment policy and procedure, the recruitment notice at gate, payrolls, etc.
7. The labour contracts of all workers were available for review. The labour contracts were signed by workers themselves. The interviewed workers knew clearly the contents of the labour contracts. The terms and conditions stated in the contracts accurately reflected the agreed payment and terms in the recruitment process and complied with local laws.

Evidence examined:

1. Personal files with labour contracts and ID copies for the workers
2. Recruitment policy and procedure
3. Trainings records about the recruitment policy and procedure
4. The recruitment notice at gate
5. Payroll records
6. Management interview and worker interview

8. Regular employment is provided

Data points

| | |
|---|--------|
| Percentage of workers that are permanently or temporarily employed | 100.0% |
| Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment | 0.0% |
| Percentage of workers employed as apprentices, trainees or interns | 0.0% |

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

Management systems

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility had established sub-contracting and home-working management policy and procedure.
- According to the sub-contracting and home-working management policy, subcontracting and home-working would not be used unless there was a previous agreement from the main clients and home worker could never be used.
- A written procedure was adopted to ensure the legal requirements in terms of social compliance (such as the working time, wages and benefits, health and safety working environment), ethics and environmental performances of the subcontractors were assured.
- All policies and procedures were appropriate for the facility and lead to sustainable compliance with all of the Workplace Requirements. The facility would update the policy and procedures if relevant laws and regulations are updated to ensure long term compliance in the future.

2. Resources:

- The facility assigned Mr. Wang Shangping / HR Supervisor to oversee the implementation of the subcontracting and home-working management procedure.
- The assigned person was aware of the relevant responsibilities, and had necessary skills and seniority to manage the sub-contracting and home-working issues.
- However, the facility did not appointed backup person in case of position change or absence to ensure long-term compliance in the future.

3. Communication and Training:

- The facility provided effective training and communication on the sub-contracting and home-working management procedure to all relevant workers, including the manager, supervisors, administration staff and normal production workers etc.
- The training content was updated according to need and the procedure for this was documented.
- The interviewed employees, managers and supervisors knew the sub-contracting and home-working management procedure clearly.

4. Monitoring:

- The facility had mechanism in place to monitor its adherence to the policy on subcontracting and home-working. All processes were completed in the facility. The facility simplified monitoring efforts and can maintain a higher level of control over the quality and timeliness of its work.
- The facility conducted the internal social compliance audit once per year, which covered the subject of sub-contracting and home-working, and the results were reviewed and acted upon by management.

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|--|---|------------|-------------|
| | | | No findings |
| Systems and evidence examined to validate this code section | <p>Current systems:</p> <ol style="list-style-type: none"> 1. The facility had established a policy to ensure sub-contracting would not be used unless previously agreed with the main clients. 2. All processes were finished within the facility. 3. No sub-contracting was used by this facility. 4. No home-working was used by this facility. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Policy on sub-contracting 2. Reviewing of the production records such as materials receiving and issuing records. 3. Facility tour (calculation on total production and estimated capacity) | | |

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 homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
The facility did not buy products or services from suppliers that use homeworkers.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
No subcontractor was used by the facility.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

[← Code area 8.A](#)

[Code area 9 →](#)

9. No harsh or inhumane treatment is allowed

Management systems

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility has established an anti-harsh or anti-inhumane treatment policy that clearly outlines the prohibition of physical abuse, threats of physical abuse, sexual or other harassment, verbal abuse, and other forms of intimidation.
- The facility has also established a disciplinary procedure for employees' misbehavior which included oral warning, written warning and finally termination. No monetary fine was used as disciplinary measure.
- These policies and procedures would be updated if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- The facility had appointed Mr. Wang Shangping / HR Supervisor to be responsible for implementing and enforcing the anti-harsh or anti-inhumane treatment policy, ensuring that all employees are aware of and compliance with it's provisions. Responsibilities were clear and the manager was aware of the responsibilities. He had the necessary skills and seniority to manage this issue.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The facility provided effective training and communication on the anti-harsh or anti-inhumane treatment policy and the disciplinary procedure to all relevant workers, including the manager, supervisors, administration staff and normal production workers etc.
- Employee interview confirmed that they were aware of anti-harsh or inhumane treatment policy and disciplinary procedure, and the grievance mechanisms were legitimate, accessible to all, predictable and equitable.
- The relevant policies and procedures were written in the local language (i.e. Chinese) and posted in the notice boards to let the workers view anytime.

4. Monitoring:

- The facility monitored compliance with the anti-harsh or anti-inhumane treatment policy. The facility had implemented a formal process for employees to report grievances (concerns, complaints, or problems) without fear of retaliation. The grievance mechanism was legitimate, accessible, predictable, equitable, transparent, rights-compatible, continuously improving and based on engagement and dialogue.
- The facility conducted a risk assessment on harsh or inhumane treatment, including gender-based violence and harassment to identify where hazards may be more likely to occur.

Management systems

- The facility also conducted the internal social compliance audit once per year, which covered the subject of no harsh or inhumane treatment requirements, and the results were reviewed and acted upon by management. The requirements of no harsh or inhumane treatment were implemented and controlled effectively. The monitoring ensured sufficient management of workplace requirements on an ongoing basis.

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 facility established anti-harsh or inhumane treatment policy. The policy stated that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Worker interviews confirmed that they were aware of the anti-harsh or inhumane treatment policy, and there was no physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation in the facility.
2. The facility established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination. No monetary fine was used as disciplinary measure. Worker interviews confirmed that they were aware of the disciplinary procedure and there was no monetary fine.
3. The anti-harsh or inhumane treatment policy and the disciplinary procedure were communicated to the workers through regular trainings. Worker interviews confirmed that they attended these trainings regularly.
4. The facility had established a transparent system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter. This mechanism was legitimate, accessible to all, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on stakeholder engagement. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for the workers and other stakeholders and external communities to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings. The designated person for it was Mr. Wang Shangping / HR Supervisor. Worker interviews confirmed that they were aware of this system for confidentially reporting and dealing with the reporting any violations of labour standards and health & safety or any other grievance without fear of reprisal towards the reporter.

Evidence examined:

1. The anti-harsh or inhumane treatment policy and the disciplinary procedure; the grievance mechanisms
2. Training records regarding anti-harsh or inhumane treatment policy and disciplinary procedure
3. Internal grievance procedure
4. Facility tour
5. Management interview and worker interview

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')? | <p>Yes, there is a formal grievance process</p> <p>The grievance process is available to all workers</p> <p>The grievance process is available to members of the local community</p> |
| What type of grievance mechanism(s) are available? | <p>The facility had established a transparent system for confidentially reporting and dealing with the reporting any violations of labor standards and health & safety or any other grievance without fear of reprisal towards the reporter. The responsible person and contact methods (e.g. mobile phone numbers and email address as well as suggestion box) were available for its employees, external communities and other stakeholders to report relevant complaints without fear of reprisal and such kind of channel information was publicized through posters and regular trainings.</p> |
| Number of grievances raised in the last 12 months | <p>0</p> |
| Number of grievances resolved in the last 12 months | <p>0</p> |

10.A. Environment 2-Pillar

Management systems

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

Management systems

Explanation for management systems grades

1. Policies and Procedures:

- The facility had the environmental policy which was endorsed by the general manager;
- The environmental policy included commitments to improve environmental performance and an approach to managing environmental impacts on relevant stakeholders, and stipulated that the facility will meet the legal environmental laws, save energy and natural resources, reduce pollution, enhance biodiversity protection and sustainable development.
- The facility had the environmental management procedure, which stated how to achieve the environmental goals. These policies and procedures were reviewed and updated annually to ensure they remained relevant and effective in mitigating risks.

2. Resources:

- The facility assigned Mr. Wang Shangping / HR Supervisor to oversee the implementation of the environmental policy and the environmental management procedure.
- Mr. Wang Shangping / HR Supervisor was awareness of the significant environmental impact of their site and its processes and was aware of the local, regional and national environmental laws relating to the site, and have clear processes around how these laws are updated and communicated.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- The facility provided training to its employees including the manager, supervisors, administration staff and normal production workers etc. on environmental laws, regulations, environmental policy, and the environmental management procedure.
- The training records was in place and auditor can be triangular to confirmed that the facility had conducted the training and the training was carried out as planned.
- The interviewed workers, managers and supervisors knew the environmental policy and the environmental management procedure clearly.

4. Monitoring:

- The facility effectively monitors the environmental requirements in accordance with the policies and procedures .
- The EHS Committee which consisted of members from different departments would identify and monitor potential negative environment impacts of operations and supply chain and had established a systems that prevent, mitigate or remedy the impacts of their own operations.

[← Code area 9](#)

[Code area 10.B →](#)

Management systems

- A resource targets was established and the facility developed a plan to reach them.
- The facility conducted a risk assessment to evaluate the significant environmental impacts of its sites annually.
- The facility conducted the internal social compliance audit once per year, which covered the subject of the environmental requirements, and the results were reviewed and acted upon by management to ensure long-term compliance in the future.
- However, gaps in monitoring of environment managements were observed, that did not ensure sufficient management of workplace requirements on an ongoing basis.

Summary of findings

| Code area | Workplace requirement | Area of NC | Finding |
|----------------------------|--|------------------------|---------------------------------|
| 10.A. Environment 2-Pillar | 10.A.B Comply with relevant local, regional a... | Local law Base code | NC ZAF601180143 |

Systems and evidence examined to validate this code section

Current systems:

1. The facility established the environmental protection policy for review.
2. The facility had compiled one written significant environmental factors of their site and its processes.
3. The facility established a comprehensive and tested emergency plan to mitigate environmental impact in case of incidents.
4. Mr. Wang Shangping / HR Supervisor was appointed responsible for environmental issues.
5. The facility had not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.
6. The facility had provided the environmental impact report form and environment impact assessment approval for review. However, no environmental protection acceptance checks report for completed construction project was available for review, please refer to related sections for details.
7. The facility had transferred all hazardous wastes to qualified unit.
8. The facility had monitored all pollutant emission annually.

Evidence examined:

1. Legally required environmental documents were provided for review
2. Environmental policy
3. Pollutant emission testing report review.
4. Employee and management interview
5. Site tour

Findings: non-compliances

ZAF601180143

Non-compliance

Due 2025-12-13

Code area

10.A Environment 2-Pillar

Status

Closed (2025-12-03)*

Workplace requirement

10.A.B Comply with relevant local, regional and national laws or regulations, and have the correct documentation or permits, including for resource use (e.g. water, energy, material) and waste disposal.

Time given to resolve

30 days

Issue title

606 - Environmental certifications or environmental management systems documentation were not available to review

Verification method

Desktop audit

Description

No environmental protection acceptance checks report for completed construction project. During facility tour, auditor found that products in the facility are paper products, and the main processes are cutting, die-cutting, printing, binding, foil stamping, laminating, packing, etc. The waste gas, wastewater and hazardous waste which generated during manufacturing would cause influence on the environment. However, during document review, the facility could not provide the environmental protection acceptance check approval for their construction project for review.

Area of non-compliance/non-conformance

Local law

Base code

企业没有建设项目环境保护竣工验收。在现场巡查时，审核员发现企业生产产品为纸制品，主要工序为切纸，模切，印刷，装订，烫金，覆膜，包装等，生产过程中产生的废气、废水及危险废弃物会对环境造成影响。但在文件审核中，企业无法提供该建设项目的环境保护竣工验收报告供审阅。

Corrective and preventative actions

The facility management explained that due to the relocation of the enterprise, the environmental assessment documents were not updated in a timely manner.

The facility would obtain environmental protection acceptance checks report for completed construction project as soon as possible and enhance training about environmental issues.

[← Code area 10.A](#)

[Code area 10.B →](#)

Local law reference

In accordance with the Measures for the Administrative Regulation on Environmental Protection of Construction Projects Article 17, After the completion of the construction project which requires compiling Environmental Impact Report or Environmental Impact Report Form, the construction entity shall carry out inspection and acceptance for the ancillary environmental protection facilities and compile the acceptance report in according with the standards and procedures provided by the administrative department of environmental protection of the State Council. During the process of inspection and acceptance of the environmental protection facilities, the construction entity shall, strictly according to facts, inspect, monitor and record the status of the construction and adjustment of environmental protection facilities. Falsification is prohibited. The construction entity shall make the acceptance check report available to the public according to law, except it is required to keep confidential according to the provisions of the State.

* PDF generated at 07:26 (UTC) on 03 Dec 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

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? | ISO 14001:2015 certificate with valid date from: 2nd February 2024 to 1st February 2027. |
| Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))? | Yes FSC certificate with valid date from 24th September 2023 to 23rd September 2028. |
| Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change? | Yes The facility had implemented a plan to protect workers from the impact of climate change. |

[← 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 | <p>Current systems:</p> <ol style="list-style-type: none"> 1. The facility had provided annual testing report of its pollutions. 2. The facility was aware of their clients' environmental requirements and they had established a system to monitor to meet these requirements. 3. The facility had an environmental policy, covering their environmental impact, which was communicated to all appropriate parties, including its own suppliers. 4. The facility provided environmental documents for review. 5. The facility measured and monitored its energy usage. The facility monitored electricity monthly. Water usage, water waste and all other waste were monitored quarterly and a matrix report was kept on file. 6. The facility conducted training for all employees on the avoidance of environmental impact. The facility established a comprehensive and tested emergency plan to mitigate environmental impact in case of incidents. 7. The facility provided the environmental management systems documentation for review. 8. Mr. Wang Shangping / HR Supervisor was in charge of environmental issues. 9. The facility had not been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Legally required environmental documents were provided for review. Such as environmental protection policy, environmental pollution emergency plan, environment impact assessment report, environment impact assessment approval, matrix report on energy usage, environment training record were provided for review. 2. Energy bills 3. Water bill 4. Renewal energy specification 5. Site tour 6. Management interview and employees' interview | | |

10.B. Environment 4-Pillar

Data points

| | |
|---|--|
| <p>Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?</p> | <p>Yes</p> |
| <p>What additional specific environmental policies does the site capture?</p> | <p>Switching to renewable energy sources Responsible use and management of water Packaging optimization Sustainable material sourcing</p> |
| <p>Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?</p> | <p>Yes The facility had adopted effect system in managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.</p> |
| <p>Does the site have reduction targets in place to manage climate related risks?</p> | <p>Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to reduce scope 2 greenhouse gases (GHGs) Yes, to reduce scope 3 greenhouse gases (GHGs)</p> |
| <p>Are any of these science-based targets?</p> | <p>No, but we anticipate setting one in the next two years</p> |
| <p>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))?</p> | <p>Yes The site had established reduction targets in place for environmental aspects, such as reduce 3% of the water and 4% of the electricity consumption by the end of 2025.</p> |
| <p>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?</p> | <p>Not Applicable</p> |

[← Code area 10.B](#)

[Code area 10.C →](#)

Usage/discharge analysis

| | Last full calendar year (2024) | Previous full calendar year (2023) |
|--|--------------------------------|------------------------------------|
| Total electricity consumption from non-renewable sources (kWh) | 0 | 0 |
| Total electricity consumption from renewable sources (kWh) | 4,966,559 | 5,105,982 |
| Sources of renewable energy used | Utility provider | Utility provider |
| Types of renewable energy used | Hydroelectric | Hydroelectric |
| Total natural gas consumption (kWh) | 0 | 0 |
| Usage of other purchased fuels | Petrol: 16222 L | Petrol: 14199 L |
| 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) | 51,098 | 64,486 |
| Water discharged | Municipal sewage network | Municipal sewage network |
| Water volume discharged (m3) | 51,098 | 64,486 |
| Water volume recycled (m3) | 0 | 0 |

[← Code area 10.B](#)

[Code area 10.C →](#)

| | | |
|-------------------------------------|-------|-------|
| Total waste produced (mt) | 228 | 280 |
| Total hazardous waste produced (mt) | 6 | 5 |
| Waste to recycling (mt) | 96 | 126 |
| Waste to landfill (mt) | 0 | 0 |
| Waste to other (mt) | 126 | 149 |
| Total product produced (mt) | 4,160 | 5,145 |

[← 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 | Some Improvements Recommended |
| Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures | Robust Management Systems |
| Monitor the effectiveness of procedures to meet policy and workplace requirements | Robust Management Systems |

[← Code area 10.B](#)

Management systems

Explanation for management systems grades

10.C. Business ethics

1. Policies and Procedures:

- The facility had established policies and procedures on Business ethics. Responsibilities and processes to implement policies and procedures are clear.
- The facility has also established a confidential whistleblowing procedure.
- These policies and procedures would be updated if relevant laws and regulations are updated to ensure long-term compliance in the future.

2. Resources:

- The facility assigned Mr. Wang Shangping / HR Supervisor to oversee the implementation of the business ethics management procedure.
- Mr. Wang Shangping / HR Supervisor was awareness of the business ethics of their site and its processes and was aware of the local, regional and national business ethics laws relating to the site, and have clear processes around how these laws are updated and communicated.
- However, through the analysis of structure, apart from Mr. Wang Shangping / HR Supervisor, no written appointment was in place for interim responsibility in the case of position change or absence.

3. Communication and Training:

- Through document review and management interview, the facility only provided training to manager and supervisors on business ethics laws, regulations, business ethics policy, and the business ethics management procedure.
- The training records was in place and auditor can be triangular to confirmed that the facility had conducted the training and the training was carried out as planned.
- The interviewed managers and supervisors knew the business ethics policy and the business ethics management procedure clearly.

4. Monitoring:

- The facility had monitored the Business Ethics requirements normally. The facility established confidential reporting channels, including grievance boxes, hotlines, and other accessible reporting mechanisms, for employees and suppliers' employees to confidentially report suspected violations of business conduct.
- This setup facilitated monitoring and early detection of unethical practices, encouraging a culture of transparency and accountability. The facility assessed the risks of bribery, corruption or any fraudulent or unethical business practices and implemented measures to mitigate these risks.
- The facility conducted the internal social compliance audit once per year, which covered the subject of the business ethics, and the results were reviewed and acted upon by management to ensure long-term compliance in the future.

[← 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 | <p>Current systems:</p> <ol style="list-style-type: none"> 1. Mr. Wang Shangping / HR Supervisor was the designated person responsible for implementing standards concerning Business Ethics. 2. The facility established a business ethics policy which was communicated to employees through posters and training. 3. The facility had received and read the Business Ethics policy of the auditor/audit company. 4. There was an internal grievance process, which was an anonymous email address. <p>Evidence examined:</p> <ol style="list-style-type: none"> 1. Business ethics policies/procedures. 2. Employee handbook. 3. Employee interview and management interview. | | |

[← Code area 10.B](#)

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?

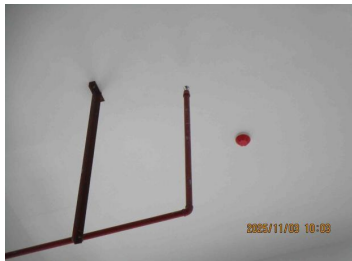
No

Provide any certified anti-bribery management systems for the site

No such certificate was observed.

[← Code area 10.C](#)

Attachments



[Smoke detector and fire sprinkler.jpg](#)



[Safety exit sign and emergency light.jpg](#)



[Working with PPE \(active carbon mask and earplugs\).jpg](#)



[MSDS.jpg](#)



[Evacuation staircase with emergency lighting and evacuation sign.jpg](#)



[Screen printing.jpg](#)



[Electric box.jpg](#)



[Toilet.jpg](#)



[No safety label for hazardous chemical.jpg](#)



[Kitchen.jpg](#)

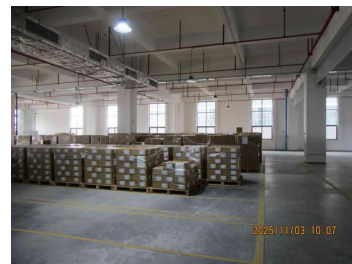


[First aid kit.jpg](#)



[Fire alarm.jpg](#)





[UV printing.jpg](#)



[Raw material warehouse.jpg](#)



[Paper sheeting.jpg](#)



[Finished goods warehouse.jpg](#)



[Safety label for chemical.jpg](#)



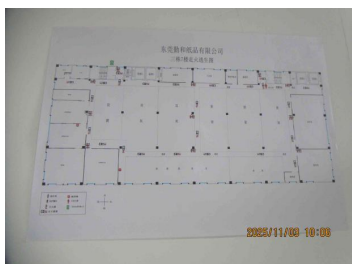
[Anti-explosion lighting.jpg](#)



[Fire hydrant.jpg](#)



[Production buildings.jpg](#)



[Evacuation plan.jpg](#)



[Fire extinguishers.jpg](#)



[Cutting.jpg](#)



[Drinking water.jpg](#)



[Casing-in.jpg](#)



[Die-cutting.jpg](#)



[Eye washing facility.jpg](#)



[Suggestion box.jpg](#)





[No smoking sign.jpg](#)



[Facility name.jpg](#)



[Facility gate.jpg](#)



[Laminating.jpg](#)



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[Adhesive binding.jpg](#)



[Auto die-cutting.jpg](#)





[Bedroom.jpg](#)

[Evacuation sign.jpg](#)

[Notice board.jpg](#)

[Handwork.jpg](#)



[Printing-night shift.jpg](#)

[Bookbinding-night shift.jpg](#)

[Adhesive binding-night shift.jpg](#)

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