

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	ZS1027123	Site name	YIWU OUJIA BAGS CO LTD
Business name	YIWU OUJIA BAGS CO LTD	Site address	4th Floor, Building 5, No. 121, Changfu Road, Suxi Town, Yiwu City, Jinhua City, Zhejiang Province 浙江省义乌市苏溪镇长府路121号 5号楼4楼 义乌 CN 322000

Audit details

Sedex company reference	ZC1060582	Auditor company name	BUREAU VERITAS CPS - ASIA	
Audit company address	7th Floor. Octa Tower. 8 Lam Chak Street, Kowloon Bay, Kowloon, HONG KONG, CN, -			
Date of audit	2025-11-05	Audit conducted by	Look Chen	
Audit pillars	Labour Standards Health and safety Environment 4-Pillar Business ethics			
Time in and out	Day 1		Day 2	
	In	09:00	In	09:00
	Out	17:00	Out	13:00
Audit type	Periodic			

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Was the audit announced? Semi announced

Was the Sedex SAQ available for review? Yes

Who signed and agreed CAPR? Mrs. Zhang Qianqian / Admin Manager

Any conflicting information SAQ/Pre-Audit Info No

Is further information available? No

Audit attendance

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

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

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

Reason for absence at the closing meeting There is no trade 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)

The audit window of this semi-announced audit is 4 weeks from October 29, 2025 to November 25, 2025.

Lead auditor

Look Chen

APSCA Number

21702592

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	Mrs. Zhang Qianqian
Title	Admin Manager
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.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601180704
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601180703
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601168280
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law	NC ZAF601168281

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	ZC1060582	
Sedex site reference	ZS1027123	
Company name	YIWU OUJIA BAGS CO LTD	
Business ownership type	GOODS	
Site name	YIWU OUJIA BAGS CO LTD	
Site name in local language	义乌市欧嘉箱包有限公司	
GPS location	GPS address	4th Floor, Building 5, No. 121, Changfu Road, Suxi Town, Yiwu City, Jinhua City, Zhejiang Province
	Coordinates	Latitude: 29°24'35" N; Longitude: 120°8'0" E
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Mrs. Zhang Qianqian
	Job title	Admin Manager
	Phone number	13735758030
	Email	steven@mtbag.cn

[← Management systems](#)

[Worker analysis →](#)

Company and site details

Applicable business and other legally required business license numbers and documents

1. Business license: 91330782093370034K; Valid from March 12, 2014 to March 11, 2034.
2. Fire license number: No.330782191912258482217, issued on December 6, 2010.
3. Construction safety document number: Nil, issued on March 16, 2020.
4. Elevator inspection number: No. DTD25YW17162, valid from October 11, 2025 to October 10, 2026.

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of luggage, handbags and the like, saddlery and harness
	Secondary	
	Other	
Product type	Bags	
Process overview	Main products: Bags Main process: cutting, sewing, inspecting and packing Production line: 1 line Main equipment: cutting machine and sewing machine	
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>The facility only rented the 4th floor of one 6-storey building as workshop, warehouse and office room. The other floors were occupied by other tenants. The lease contract was available for review and no co-mingling workers were noted onsite.</p>
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[← Site details](#)

[Worker analysis →](#)

Site scope

Building 1	Last construction works on site	2020
	If building is shared, provide details	The facility only rented the 4th floor of one 6-storey building as workshop, warehouse and office room. The other floors were occupied by other tenants. The lease contract was available for review and no co-mingling workers were noted onsite.
	Number of floors	6
	Description of floor activities	First floor to third floor: Occupied by other tenants. Fourth floor: Used by the audited facility as as workshop, warehouse and office room. Fifth to sixth floor: Occupied by other tenants.

Is there any difference between the site scope of the audit and the Sedex site profile? No

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site? No

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

Worker accommodation and transport

Are there any site-provided worker accommodation buildings? No

[← Site details](#)

[Worker analysis →](#)

Worker accommodation and transport

Does the site organise worker transport to the worksite? Not applicable
No transportation was provided by the facility and it is not legally required.

Work patterns

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

Is there any night shift work at the site? No

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No
No negative impacts.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? No
No Human Rights Impact Assessment (HRIA) was conducted.

[← Site details](#)

[Worker analysis →](#)

Worker analysis

Gender disaggregated data available Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	7 (70%)	3 (30%)	- -	10 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	7 (70%)	3 (30%)	- -	10 (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	6 (66.7%)	3 (33.3%)	- -	9 (90%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	6 (66.7%)	3 (33.3%)	- -	9 (90%)

* % of total workforce

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

Jiangxi, Yunnan, Hubei and Guizhou provinces

Workers by age

	Men	Women	Other	Total
18 - 24 years old	1 (50%)	1 (50%)	- -	2 (20%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods There is no obvious peak and low season 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	70%	30%	-	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	7 (70%)	3 (30%)	- -	10 (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	7 (70%)	3 (30%)	- -	10 (100%)
Other	0 -	0 -	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details

All the workers were paid on monthly basis.

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (66.7%)	1 (33.3%)	- -	3
Supervisors or team leaders	1 (50%)	1 (50%)	- -	2
Administrative staff	3 (33.3%)	6 (66.7%)	- -	9

[← 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 One group of 5 workers

Did workers understand the purpose of the audit? Yes

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

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 compliant was raised.

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

Equal opportunities
Freedom of movement
Work atmosphere (e.g. treatment by supervisors)
Work environment – comfort (e.g. temperature, noise or dust levels)

Additional comments

In the interview process, they were frank; no hint or coaching by management was noted. The workers' attitudes to factory management were favourable. They were satisfied with the working condition and they could go to toilet or drink water during working hours. No negative information was raised.

Apart from the 10 workers interviewed listed in the worker analysis table, another 2 employees were interviewed for business ethics and 2 employees for environment as this is a 4-pillar audit.

Attitude of workers' committee/union representatives

The representatives of worker committee stated that the working environment was clean and well lighted. And they were free to drink water and go to toilets. And factory managements were nice.

Attitude of managers

During the opening meeting, auditor explained the audit scope and the audit standard to the factory representatives.

Factory tour, document review, interviews with management members and workers were conducted as scheduled in the audit programs, a full audit was finished under the co-operation of the factory representatives.

At the end of the audit, auditors had a closing meeting with factory representatives and all findings were discussed. Factory management signed the CAP and was given a copy.

Workers interviewed by type

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

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	3	2	-	5
Workers interviewed individually	4	1	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	6	3	-	9
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	6	3	-	9

Measuring workplace impact

Gender disaggregated data available Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	5.0%	5.0%	-	10.0%
Previous full calendar year (2023)	5.0%	5.0%	-	10.0%

* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	1.0%	-	3.0%
Last full calendar year (2024)	2.0%	2.0%	-	4.0%
Previous full calendar year (2023)	2.0%	2.0%	-	4.0%

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

Accidents were recorded by designated employees.

[← Worker interviews](#)

[Code area 0 →](#)

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

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

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

Lost day work cases (per 100 workers)*

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

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

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

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

[← Worker interviews](#)

[Code area 0 →](#)

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

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%
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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.The auditors had been granted full access to the facility area. All required documents were provided for review. 2.The facility management was cooperative during the audit, no bribery or threatening case happened. 3. The facility has established CSR polices and procedures. 4.The facility has designated Mr. Xu/GM to be responsible for implementing standards concerning Human Rights. 5.The human rights policies and procedures were communicated to the employees. 6. Responsibility for meeting the legal and client code requirements is shared between management. 7. No inconsistency was found while reviewing production records such as inspection records. <p>Evidence Details: Attendance records Documents review (Privacy policy, business license, training records, etc.)</p>		

0. Enabling accurate assessment

Data points

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

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

1. Employment is freely chosen

Management systems

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

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

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

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

Explanation for management systems grades

Policies and procedures: The policy and procedure regarding free choice of employment and no forced labor is established in the site. The policy is updated regularly and approved by the Facility Manager. The policy is included in the employees' handbook and can be accessed by all employees at any time.

Resources: The whole HR department in the site is responsible for the implementation. HR Manager is designated as the person in charge and is familiar with the policy and procedure.

Training: Related training is provided for both management and workers. Training records are provided for review.

Monitoring: The site conducts internal audit regularly as self-monitoring and the implementation of free choice of employment is an important part in the internal audit. Per management interview, HR Manager will monitor the implementation of this issue and report it to the top 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. There is no forced, bonded or involuntary prison labour. 2. A policy which prohibits forced labour was available for review. 3. Generally, the job applicants need to provide their ID cards for age verification, but only hardcopies would be kept and the original ID cards would be returned to the workers. 4. According to interview with workers and management, overtime was voluntary and workers could choose work overtime or not independently. <p>Evidence Details: Document review (Policy documents, factory rules, employee handbook, etc.) Worker interviews</p>		

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

<p>Develop and maintain relevant policies and procedures to ensure workplace requirements are met</p>	<p>Robust Management Systems</p>
<p>Appoint a manager with sufficient seniority who is responsible for implementing procedures</p>	<p>Robust Management Systems</p>
<p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures</p>	<p>Robust Management Systems</p>
<p>Monitor the effectiveness of procedures to meet policy and workplace requirements</p>	<p>Robust Management Systems</p>
<p>Explanation for management systems grades</p>	<p>Policies and procedures: The policy and procedure regarding responsible recruitment and entitlement to work is in place, and the site establishes the worker recruiting procedure to identify the hiring and management of all migrant workers and contracted workers.</p> <p>Resources: The whole HR department in the site is responsible for the implementation. HR Manager is designated as the person in charge and is familiar with the policy and procedure.</p> <p>Training: Related training is provided for both management and workers. Training records are provided for review.</p> <p>Monitoring: The site conducts internal audit regularly as self-monitoring and the implementation of responsible recruitment is an important part in the internal audit. Per management interview, HR Manager will monitor the implementation of this issue and report it to the top management regularly.</p>

[← Code area 1](#)

[Code area 2 →](#)

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. Per documents review, factory management representation and worker interview, all workers in the factory was Chinese, no migrant worker from other countries was noted in the facility. 2. All workers had the proper legal rights to work and all of them were recruited directly by the facility. No labor provider or recruitment agency used by facility. 3. Workers are not required to pay recruitment fees or related cost in the facility. <p>Evidence Details: Management interview Document review (Factory policy, personnel files, etc.)</p>		

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes? Workers are recruited, selected, and hired directly by our company

How do the labour providers recruit and hire workers? N/A - Recruitment providers not used

Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey? 0

Are there any subcontracted workers (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 90%

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 Jiangxi, Yunnan, Hubei and Guizhou provinces.

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 and costs paid by workers during the recruitment and employment process.

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

Management systems

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

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

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

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

Management systems

Explanation for management systems grades

Policies and procedures: A policy and procedure concerning Freedom of Association and the Right to Collective Bargaining is in place. The policy is updated regularly and approved by the HR Manager. The policy is included in the employees' handbook and can be accessed by all employees at any time.

Resources: The site does not interfere in the establishment, functioning or administration of worker organization or collective bargaining. There is a worker committee in the site. Worker representatives are freely elected by all employees including the production workers fairly and publicly. HR Manager is tasked with ensuring regular meetings with worker representatives to address concerns or provide updates. The meeting records are provided for review.

Training: The site has conducted abundant training including the topic of Freedom of Association and the Right to Collective Bargaining for all employees, and many kinds of communication channels for workers to raise concerns are established in the site.

Monitoring: Per management interview, HR Manager will monitor the implementation of policy and procedure about freedom of association and report it to the top management regularly.

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 policy about Freedom of Association and Right to Collective Bargaining was established.
2. The factory didn't hinder free association and bargaining via interview.
3. Worker's committee was established in the facility. The members were freely chosen by fellow workers.

Evidence Details:

Document review (Factory policy, electing records, meeting records, etc.)
Interviews with workers, worker's committee members and management

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

<p>Develop and maintain relevant policies and procedures to ensure workplace requirements are met</p>	<p>Robust Management Systems</p>
<p>Appoint a manager with sufficient seniority who is responsible for implementing procedures</p>	<p>Some Improvements Recommended</p>
<p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures</p>	<p>Fundamental Improvements Required</p>
<p>Monitor the effectiveness of procedures to meet policy and workplace requirements</p>	<p>Robust Management Systems</p>
<p>Explanation for management systems grades</p>	<p>Relevant complete written policies and procedures were established and updated annually to ensure Workplace Requirements were met. The latest two fire drills were conducted on March 10, 2025 and August 8, 2025 respectively.</p> <p>Senior management was responsible for implementing the procedures, training was provided to the responsible supervisor, the management was familiar with most of the EHS requirement, but management did not know some of the local laws concerning EHS issues.</p> <p>The EHS Policy and procedure is communicated to workers annually. The EHS training covers building safety, fire safety, electrical safety, machine safety, working at height, (hazardous/non-hazardous) chemical safety handle & disposal and PPE usage. Although related employees were trained as per the training schedule, some of the employees interviewed did not clearly know the exact Standard operation. It was noted that part of the goods were stored against the wall in the warehouse and some sewing machines were not installed with needle guard.</p> <p>Factory management would conduct the regular EHS checks and internal audit in the production area, the related written documents were provided for review.</p>

[← Code area 2](#)

[Code area 4 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	Local law	NC ZAF601180704
	3.R Provide clean and secure toilets, wash ar...	Local law	NC ZAF601180703

Systems and evidence examined to validate this code section

Current systems:

1. Related Health and safety policies were established in the factory.
2. Through factory tour, it was noted that:
The work stations were well ventilated and lit.
The factory maintained a comfortable temperature throughout work floors.
Potable water was free of charge and available in all areas.
Sufficient clean toilets segregated by gender were available at all times to workers.
Fire-fighting equipment was adequate and checks were up-to-date.
Fire drills (conducted on March 10, 2025 and August 8, 2025) were organized and records were provided.
3. Related trainings were provided regularly for employees.
4. Legal construction safety document was provided for review.

Evidence Details:

Document review (Health and safety policy, training records, fire drills records, etc.)
Worker interview
Management interview

Findings: non-compliances

ZAF601180704

Non-compliance

Due 2025-12-13

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

Time given to resolve

30 days

Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

Verification method

Desktop audit

Description

It was noted that 3 out of 15 sewing machines were not installed with needle guard in the sewing section. 审核员发现工厂车缝车间3/15台针车没有安装针挡。

Area of non-compliance/non-conformance

Local law

Corrective and preventative actions

It was recommended that the sewing machine should be installed with needle guard.建议给针车安装针挡。

Local law reference

In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.

根据《生产设备安全卫生设计总则(GB5083-1999)》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。

Evidence

[← Code area 3](#)

[Code area 4 →](#)



[sewing machine not installed with needle guard.JPG](#)

* PDF generated at 08:57 (UTC) on 13 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

ZAF601180703

Non-compliance

Due 2026-01-12

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

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

Time given to resolve

60 days

Verification method

Desktop audit

Issue title

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

Area of non-compliance/non-conformance

Local law

Description

It was noted that part of the goods was stored against the wall in the finished product warehouse. 审核员发现成品仓库有部分货物靠墙堆放。

Corrective and preventative actions

It is recommended that management adopt practices and controls to ensure that the width of gap between stacks and walls and the width of gap between stacks and posts are in accordance with the legal requirement. 建议工厂确保仓库库存物品垛与墙的间距、垛与柱的间距符合法律要求。

[← Code area 3](#)

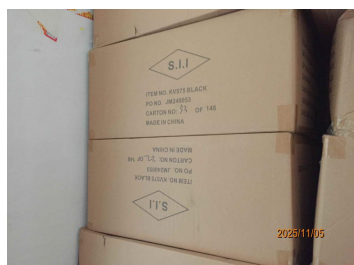
[Code area 4 →](#)

Local law reference

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

根据《仓库防火安全管理规则》第18条：库存物品应当分类、分类储存，每垛占地面积不宜大于100平方米，垛与垛间距不小于1米，垛与墙间距不小于0.5米，垛与梁、柱的间距不小于0.3米，主要通道的宽度不小于2米。

Evidence



[goods stored against the wall.JPG](#)



* PDF generated at 08:57 (UTC) on 13 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner 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)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Not applicable
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 additions.
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

<p>Develop and maintain relevant policies and procedures to ensure workplace requirements are met</p>	<p>Robust Management Systems</p>
<p>Appoint a manager with sufficient seniority who is responsible for implementing procedures</p>	<p>Robust Management Systems</p>
<p>Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures</p>	<p>Robust Management Systems</p>
<p>Monitor the effectiveness of procedures to meet policy and workplace requirements</p>	<p>Robust Management Systems</p>
<p>Explanation for management systems grades</p>	<p>Policies and procedures: The policy and procedure about child labour is established in the site. The site pays much attention to the child labour issue. The policy includes commitment to all the SMETA requirements, as well as key responsibilities and procedures by which it will be implemented. The child labor remediation procedure was established in the facility.</p> <p>Resources: Both HR department and production department in the site are responsible for the implementation. HR Manager is designated as the person in charge and is familiar with the policy and procedure.</p> <p>Training: Relevant training about child labour is provided for all employees in the site. Sufficient training records are provided for review. All interview employees know that child labour is absolutely forbidden in the site.</p> <p>Monitoring: HR related officers are well of the recruitment process established by the site including robust age-verification mechanisms. They will check the ID strictly during the hiring process to ensure that no child labor is hired. No child labor is noted in the site with confirmation.</p>

[← Code area 3](#)

[Code area 5 →](#)

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. Anti-Child labour policy was established. 2. Factory maintained all workers' ID card copies. 3. According to the employees' ID numbers in the factory name list, the youngest worker was 21 years old. 4. The facility has established child labor remediation procedure, the facility would take immediate and strict actions in accordance with the procedures and local law once child labor is detected. <p>Evidence Details:</p> <p>Document review (ID copy and personnel files, Factory policies, child labor remediation procedures etc.)</p> <p>Employee interview</p> <p>Site tour</p>		

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	20%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	21
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	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	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Relevant complete written policies and procedures about of wages and benefit were established and updated annually to ensure Workplace Requirements were met.</p> <p>Senior management was responsible for implementing the procedures, training was provided to the responsible supervisors, but the management was not aware of partial legal requirement of wage and benefit.</p> <p>Although related employees were trained as per the training schedule, some employees interviewed did not clearly know the exact Standard operation, such as some employees were not willing to participate in the social insurance.</p> <p>The management conducted regular internal audits and provided the related audit records for review.</p>

Summary of findings

[← Code area 4](#)

[Code area 5.A →](#)

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law	NC ZAF601168280

Systems and evidence examined to validate this code section

Current systems:
 The auditor reviewed the payroll records of 10 samples from January 2025, 10 samples from July 2025, 10 samples from September 2025. Per payroll registers and employees & management interview, all employees were paid via bank transfer before the 10th day of the following month. As per the provided payroll register, all workers were paid by hourly rate, the hourly rate for all sampled workers were paid at least RMB21.26 per hour, which was not less than the local minimum wage RMB2260 per month or RMB12.99 per hour effective from January 1, 2024.

It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt of September 2025, there are a total of 24 employees in the facility, with no retired employees and newly hired employees. It was noted that 14 employees were provided with pension, unemployment, work injury, medical and maternity insurance. The facility also provided commercial accident insurance for 20 employees from December 20, 2024 to December 19, 2025.

Evidence Details:
 Document review (Payroll records, social insurance receipts, etc.)
 Employee interview

Findings: non-compliances

ZAF601168280

Non-compliance

Due 2025-01-26

Code area

5 Legal wages are paid

Status

Open*

Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

Time given to resolve

60 days

Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

Verification method

Follow up audit

Description

It was noted that the factory's social insurance coverage was insufficient. According to the social insurance payment receipt of September 2025, there are a total of 24 employees in the facility, with no retired employees and newly hired employees. It was noted that 14 employees were provided with pension, unemployment, work injury, medical and maternity insurance. The facility also provided commercial accident insurance for 20 employees from December 20, 2024 to December 19, 2025.

Area of non-compliance/non-conformance

Local law

审核员发现工厂给员工提供的社保不足。根据工厂提供的2025年9月份的社保收据，工厂总共有24名员工，无退休和新入职员工。其中14名员工购买了养老，医疗，工伤，生育和失业保险。工厂给20名员工购买了商业意外险，有效期从2024年12月20号到2025年12月19号。

Description (carried over)

It was noted that the factory's social insurance coverage was insufficient. There was a total of 25 employees now, did not include the employees who retired back to work, and no newly hired employees within 30 days, so 25 employees should participate in the social insurance program. According to the social insurance payment receipt provided by factory management, it was noted that only 15 out of 25 employees were provided with pension, unemployment, medical, maternity and accident insurances in October 2024. 审核员发现工厂的社会保险覆盖不足。工厂现有25人，没有退休返聘人员和30天内新入职员工，故应为25名员工提供社会保险。根据厂方提供的2024年10月社会保险缴费单据显示工厂仅为15/25名员工提供养老、失业、医疗、生育和工伤保险。

Corrective and preventative actions

It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements. 建议工厂为员工提供所有法定的社会保险福利。

[← Code area 5](#)

[Code area 5.A →](#)

Corrective and preventative actions (carried over)

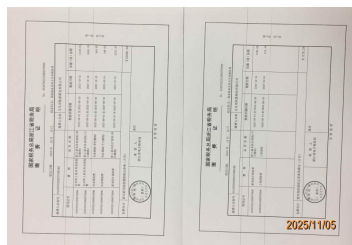
It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements. 建议工厂为员工提供所有法定的社会保险福利。

Local law reference

In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.

The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount. In accordance with Article 33 of Social Insurance Law of the People's Republic of China (2018 Amendment), employees shall participate in work-related injury insurance, and the employer shall pay the work-related injury insurance premium. Employees shall not pay the work-related injury insurance premium. 根据《中华人民共和国劳动法》第73条：劳动者在下列情形下，依法享受社会保险待遇：(一)退休；(二)患病、负伤；(三)因工伤残或者患职业病；(四)失业；(五)生育。劳动者死亡后，其遗属依法享受遗属津贴。劳动者享受社会保险待遇的条件和标准由法律、法规规定。劳动者享受的社会保险金必须按时足额支付。根据《中华人民共和国社会保险法》第33条，职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。

Evidence



[insufficient social insurance coverage.JPG](#)

* PDF generated at 08:57 (UTC) on 13 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

5. Legal wages are paid

Data points

What is the basic wage paid to workers? Wages meet a living wage
The legal minimum wage

Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers? Only digital payments

How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits? None

Worker remuneration

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

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	46.0
Minimum legal wage	Min per hour	12.99
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2260.0
Actual minimum wage	Actual per hour	21.26
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	3700.0
Minimum legal overtime wage	Min per hour	19.48
	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	31.89
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 samples from January 2025, July 2025 and September 2025 respectively
Are there different legal minimum/legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100% of workers were paid more than legal minimum wages.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
Systems and evidence examined to validate this code section	<p>The factory established the living wage procedure and calculated the living wage including food, clothing, housing, transportation and other expenses by themselves, which is in compliance with the Sedex standard. The wage paid by the factory met the local legal requirement and meet the living wage they stipulated. The facility has completed a living wage gap analysis and followed the ILO'S 10 principles.</p> <p>Details:</p> <ul style="list-style-type: none"> - Wages and benefits policy - Local legal minimum wage documents - Payroll records - Living wage calculation record and gap analysis records - Leave records and resignation records - Labour contracts of all employees (to examine agreed wage rates) - Payment receipts of social insurance and commercial accident insurance - Management and worker 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

Fundamental Improvements Required

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

Fundamental Improvements Required

Monitor the effectiveness of procedures to meet policy and workplace requirements

Fundamental Improvements Required

Explanation for management systems grades

The working hour policy was clearly mentioned in the "Employee Handbook". As per the policy, the normal working hours were 8 hours per day and 40 hours per week. Overtime work would be arranged when there was production need. There was procedure on the control of working hours, for example the total weekly working hours should not exceed 60 hours per week. Verified through management interview and worker interview, Collective Bargaining Agreement was established in the site. The "Employee Handbook" did not assign responsibilities, process in place and address the Code Area 6 (Working Hours Are Not Excessive). HR Manager was assigned responsibility for implementation according to management interview. However, HR was not aware of responsibility.

The workers received training including working hour policy from Admin Department, but the manager and supervisor were not trained on the working hour policy. The number of overtime hours was monitored by HR Manager. There was a mechanism in electronic attendance and payroll system for monitoring overtime hours. HR could easily access the data of overtime hours from this system to control the overtime hours. However, the factory management arranged the overtime hours depending on the orders, the oversights in the monitoring systems have led to the Improvements Required.

[← Code area 5.A](#)

[Code area 7 →](#)

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	Local law	NC ZAF601168281
Systems and evidence examined to validate this code section	<p>Current systems: Through employees' interview, overtime is voluntary. Only one shift was conducted in the facility: 08:00 to 11:30, 13:00 to 17:30. Based on the 30 sampled employees' attendance records provided by factory, it was noted that the maximum of overtime hours were 2 hours a regular day, 8 hours a rest day, and 46 hours in testing month. The maximum working hours were 52 hours per week. The longest consecutive working day was 6 days.</p> <p>Evidence Details: Document review (Payroll records, attendance record, etc.) Employee interview</p>		

Findings: non-compliances

ZAF601168281

Non-compliance

Due 2025-01-26

Code area

6 Working hours are not excessive

Status

Open*

Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

Time given to resolve

60 days

Issue title

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Verification method

Follow up audit

Description

It was noted that 18 out of 30 sample population employees worked in excess of the statutory overtime hour limits.

A review of 30 sample population time records (10 samples from January 2025, 10 samples from July 2025 and 10 samples from current paid month September 2025) yielded the following:

9 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 46 hours) in July 2025, which was not in compliance with the legal requirement;

9 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 46 hours) in September 2025, which was not in compliance with the legal requirement;

根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。

审核员从厂方提供的工时记录中抽取30个样本(其中从2025年1月抽取10个，从2025年7月抽取10个，从最近支付月份2025年9月抽取10个)，发现共有18名员工加班时间超出了法定标准，具体为：

- 9/10名员工在2025年7月的加班时间为46小时，超过每月加班时间不能超过36小时的法律规定；
- 9/10名员工在2025年9月的加班时间为46小时，超过每月加班时间不能超过36小时的法律规定；

Area of non-compliance/non-conformance

Local law

[← Code area 6](#)

[Code area 7 →](#)

Description (carried over)

It was noted that 20 out of 30 sample population employees worked in excess of the statutory overtime hour limits. A review of 30 sample population employees' time records (10 samples from February 2024, 10 samples from March 2024 and 10 samples from current month October 2024) yielded the following: 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 44 hours) in March 2024; 10 out of 10 sample population employees worked in excess of 36 overtime hours per month (i.e. 38 hours) in October 2024, which was not in compliance with the legal requirement. 根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。审核员从厂方提供的工时记录中抽取30个样本（其中从2024年2月抽取10个，从2024年3月抽取10个，从最近月份2024年10月抽取10个），发现共有20名员工加班时间超出了法定标准，具体为：10/10名员工在2024年3月的加班时间为44小时；10/10名员工在2024年10月的加班时间为38小时，超过每月加班时间不能超过36小时的法律规定。

Corrective and preventative actions

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

Corrective and preventative actions (carried over)

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

Local law reference

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

Evidence

生产部 2025-07-01 07:52 11:38 12:58 17:38 18:26 20:41
 生产部 2025-07-02 07:54 11:38 12:58 17:39
 生产部 2025-07-03 08:00 11:38 12:56 17:41 18:29 20:36
 生产部 2025-07-04 07:56 11:37 12:58 17:36
 生产部 2025-07-05 07:54 11:38 12:57 17:41
 生产部 2025-07-06
 生产部 2025-07-07 07:51 11:41 12:51 17:38
 生产部 2025-07-08 07:55 11:38 12:56 17:34 18:23 20:37
 生产部 2025-07-09 07:55 11:38 12:56 17:40
 生产部 2025-07-10 07:57 11:33 12:56 17:39 18:27 20:31
 生产部 2025-07-11 07:57 11:31 12:48 17:31
 生产部 2025-07-12 07:58 11:36 12:48 17:31
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 生产部 2025-07-14 07:54 11:36 12:48 17:38
 生产部 2025-07-15 07:49 11:40 12:49 17:36 18:22 20:39
 生产部 2025-07-16 07:56 11:38 12:53 17:35
 生产部 2025-07-17 07:58 11:40 12:51 17:33
 生产部 2025-07-18 07:54 11:38 12:56 17:31
 生产部 2025-07-19 07:56 11:36 12:58 17:37
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 生产部 2025-07-21 07:57 11:38 12:58 17:39
 生产部 2025-07-22 07:58 11:40 12:58 17:40
 生产部 2025-07-23 07:56 11:37 12:51 17:32
 生产部 2025-07-24 07:55 11:33 12:54 17:36 18:25 20:36
 生产部 2025-07-25 07:58 11:40 12:53 17:40
 生产部 2025-07-26 07:58 11:34 12:51 17:38
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 生产部 2025-07-28 07:57 11:38 12:58 17:40 18:24 20:33
 生产部 2025-07-29 07:48 11:32 12:55 17:40
 生产部 2025-07-30 07:52 11:38 12:58 17:36
 生产部 2025-07-31 08:00 11:38 12:58 17:38

[excessive working hours.jpg](#) 

* PDF generated at 08:57 (UTC) on 13 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	51.0
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 Robust Management Systems

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

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

Management systems

Explanation for management systems grades

Policies and procedures: The policy and procedure on anti-discrimination is in place. The policy indicates that all workers have equal right on wage and benefits, overtime, promotion, and resignation. The site would not ask unreasonable requirement during recruiting process, female workers would not be discriminated no matter whether they are married or not, they would be paid as equally as male workers in the same position.

Resources: HR Manager is designated as the person in charge and is familiar with the policy and procedure. Not only the HR department is responsible for the implementation, but all other departments are also involved in the anti-discrimination issue to ensure that no discrimination case happens in the site.

Training: Sufficient training about this issue is provided in the site. Training records are provided for review. According to the employee interview, all employees know that equal pay for equal position and no discrimination is allowed in the site.

Monitoring: The site conducts internal audit and regular inspection properly. Workers can express the complaints to workers representative and factory management about any discrimination case, or they can raise complaints through suggestion box. According to the worker interview, document review and onsite observation, no discrimination case was observed.

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 Anti-discrimination policy was established in the factory.
2. According to document review, workers interview and factory tour, there was no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, material status, sexual orientation, union membership or political affiliation.
3. The grievance mechanisms were provided to the employees, employees can submit their complaints through the suggestion box or to the facility management directly.
4. The facility has a dedicated equity approach in recruitment, training, development and promotion processes. The employees did not report any unfair cases. The facility has established and implemented equity-based practices to ensure that vulnerable workers are not only treated equally but are also provided with the support necessary to perform their roles safely and comfortably. For pregnant workers and nursing mothers, the facility reassigns tasks when necessary to reduce physical strain and ensure safety, and pregnant workers receive additional rest breaks during the workday.

The factory had equity measures to ensure all workers had the same chance for recruitment, training, career development and promotion, such as career development questionnaire was provided for workers, promotion policy and notice were communicated to all workers.

Evidence Details:

- Document review (anti-discrimination policy, hiring policy, etc.)
- Workers interview
- Factory tour

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) 33%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 33%

Three most common nationalities in managerial and supervisory roles Chinese

[← Code area 7](#)

[Code area 8 →](#)

8. Regular employment is provided

Management systems

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

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

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

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

Explanation for management systems grades

Policies and procedures: The policy and procedure on regular employment is in place. The hiring procedures indicate the employees' legal rights such as wages and benefits, working hours, occupational health and safety etc.

Resources: The HR department in the site is responsible for the implementation. HR Manager is designated as the person in charge and is familiar with the policy and procedure.

Training: Sufficient training about this issue is provided in the site. Training records are provided for review. According to the employee interview, all employees know their legal rights.

Monitoring: The site conducts internal audit and regular inspection properly. There is no temporary worker, home worker or student at school age hired by the site. The site also does not use dispatched worker.

Summary of findings

[← Code area 7](#)

[Code area 8.A →](#)

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 factory signed labour contracts with all workers to establish the employment relationship and confirm the rights and obligations of the employment conditions. 2. According to worker interview, after signing contract, the factory gave a copy to them. 3. The facility did not use apprenticeships, temporary, irregular, sub-contracted or non-employment labors in the facility. <p>Evidence Details: Document review (Hiring policy, factory regulations, etc.) Worker interview Management interview</p>		

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
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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%
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Percentage of workers employed as apprentices, trainees or interns	0.0%
--	------

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policies and procedures: The policy and procedure regarding home worker and subcontractor management is established in the site.</p> <p>Resources: HR Manager is designated as the person in charge and is familiar with the policy and procedure.</p> <p>Training: Sufficient training about this issue is provided in the site. Training records are provided for review. Although related employees were trained as per the training schedule, some of the employees interviewed did not clearly know the exact Standard operation, for example some of the employees did not know home workers should not be used by the facility and the subcontractor should be monitored on a regular basis.</p> <p>Monitoring: The site conducts internal audit and regular inspection properly. Per factory tour (factory processes), final product is finished in the site. No home worker or subcontractor used in the site.</p>

Summary of findings

[← Code area 8](#)

[Code area 9 →](#)

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"> Currently, no home worker or subcontractor used by the facility. As per site observation and management interview, there were enough machines and manpower to finish the production processes in the facility. Factory established subcontractor management policy. <p>Evidence Details:</p> <p>Document Review (Non-homeworker policy, Subcontractor management policy, etc.) Factory Tour Management interview</p>		

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

Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No
As per the document review and management interview, no homemaker was used.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No
There were no unrecorded work or undeclared sub-contracting on site.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

[← Code area 8.A](#)

[Code area 9 →](#)

Audit company:
BUREAU VERITAS CPS - ASIA

Audit reference:
ZAA600166984

Start Date:
2025-11-05

End Date:
2025-11-06

9. No harsh or inhumane treatment is allowed

Management systems

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

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

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

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

Explanation for management systems grades

Policies and procedures: The site establishes a written policy that prohibits any forms of forced labor, which includes indentured, debt bondage, slave labor or prison labor etc.

Resources: The HR department in the site is responsible for the implementation. HR Manager is designated as the person in charge and is familiar with the policy and procedure.

Training: Sufficient training about this issue is provided in the site. Training records are provided for review. According to the employee interview, the workers all state that they are not required to pay employment fees or deposits to the site. All employees are hires on a voluntary basis.

Monitoring: The site conducts internal audit and regular inspection properly. The employees are never fined. They are allowed to leave during work hours under reasonable circumstances freely. The employees can choose the position and terminate the working relationship on their own will. No wage is delay paid or withheld by the site.

[← Code area 8.A](#)

[Code area 10.A →](#)

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 Anti-harsh treatment policy was established in the factory. 2. According to the factory's regulation, physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation were prohibited in the factory. 3. According to worker interview, the factory treated every worker with respect, and no worker was subject to any physical, sexual, psychological or verbal harassment and abuse. <p>Evidence Details: Management interview Document review (Factory regulations, no harsh policy, etc.)</p>		

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process The grievance process is available to all workers
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What type of grievance mechanism(s) are available?	Suggestion box
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Number of grievances raised in the last 12 months	0
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Number of grievances resolved in the last 12 months	0
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10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policies and procedures: The site establishes the environment management procedure and provides the significant environmental impact list of their site and its processes. The policy and procedure on emergency processing procedures including emergency accident processing procedure is also in place.</p> <p>Resources: The environment department in the site is responsible for the implementation. HR Manager is designated as the person in charge.</p> <p>Training: Sufficient training about this issue is provided in the site. Training records are provided for review.</p> <p>Monitoring: The site conducts internal audit and regular inspection properly.</p>

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 9](#)

[Code area 10.B →](#)

No findings

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

Current systems:

1. Related Environment policies were established in the factory.
2. The facility management maintained all legally required environmental documents in place which proved that the production of the facility was in compliance with the related environmental regulations.
3. Based on worker's interview, they were trained on environmental protection.
4. The solid waste was recycled by qualified agent.

Evidence Details:

Document and policy review (Environment policy review, environmental documents, etc.)

Management interview

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?

None

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

Yes

The factory had a plan for energy conservation and emission reduction.

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. Related Environment policies were established in the factory. 2. The facility maintained the EIA report and approval and inspection and acceptance report of completed environmental protection facilities. 3. Based on worker's interview, they were trained on environmental protection. <p>Evidence Details:</p> <p>Document and policy review (Environment policy review, environmental documents, etc.)</p> <p>Management interview</p>		

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Responsible use and management of water Circular economy and resource efficiency
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes The facility has established a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to increase low-carbon energy consumption or production
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Water consumption and discharge: the site has set the reduction target by 1% in 3 years (2022-2025) . Reuse of reclaimed water system will be installed gradually to save the water consumption and discharge. Energy: the site has set the reduction target by 1% in 3 years (2022-2025). Photovoltaic plant will be installed gradually to save the energy.
Has the site checked that any sub-contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes Self-assessment.

Usage/discharge analysis

[← Code area 10.B](#)

[Code area 10.C →](#)

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	21,000	20,200
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	None	None
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)	360	320
Water discharged	City pipe network	City pipe network
Water volume discharged (m3)	360	320
Water volume recycled (m3)	0	0
Total waste produced (mt)	0.7	0.5

[← Code area 10.B](#)

[Code area 10.C →](#)

Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0.5	0.4
Waste to landfill (mt)	0	0
Waste to other (mt)	0.2	0.1
Total product produced (mt)	500	475

[← Code area 10.B](#)

[Code area 10.C →](#)

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	<p>Policies and procedures: A policy and procedure concerning Business ethics is in place. The policy was reviewed annually and would update as necessary.</p> <p>Resources: The HR is tasked with ensuring regular meetings with all related employees to address concerns or provide updates.</p> <p>Training: Related trainings were provided to relevant employees. Training records were provided for review.</p> <p>Monitoring: Upon discussion with the HR manager, it was confirmed that there is a monitoring system in place to improve related aspect.</p>

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 10.B](#)

No findings

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

Current systems:

1. Mr. Xu/GM was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
2. The facility established a business ethics policy which was communicated to workers through posters and training.

Evidence Details:

Management interview

Documents and policy review (Business Ethics policy review, training records, etc.)

[← 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)?

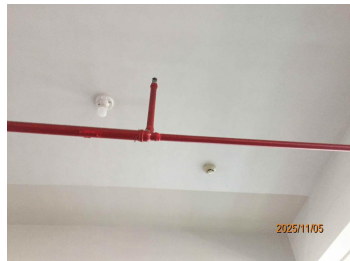
No

Provide any certified anti-bribery management systems for the site

None

[← Code area 10.C](#)

Attachments



[toilet installed with privacy door.JPG](#)

[suggestion box.JPG](#)

[smoke alarm and overhead sprinkler system.JPG](#)

[fire hydrant and fire extinguisher.JPG](#)



[finished product storage area.JPG](#)

[time recording machine.JPG](#)

[fire alarm.JPG](#)

[fire alarm button.JPG](#)

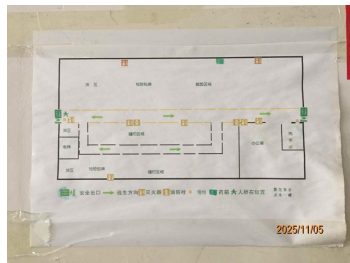


[facility name.JPG](#)

[facility gate.JPG](#)

[first aid kit.JPG](#)

[facility outlook.JPG](#)



[inspecting and packing section.JPG](#)

[facility address.JPG](#)

[evacuation plot plan.JPG](#)

[drinking water.JPG](#)



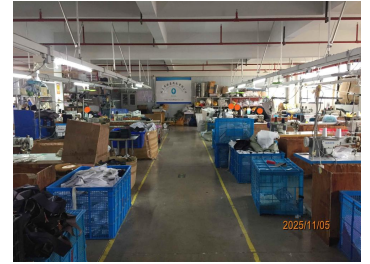
[emergency assembly point.JPG](#)



[electrical control panel marked with warning sign.JPG](#)



[exit sign and emergency light.JPG](#)



[cutting and sewing section.JPG](#)



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