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Auditee :	<b>Shenzhen Vstarcam Technology Co., Ltd.</b>
Audit Date From :	<b>25/02/2019</b>
Audit Date To :	<b>27/02/2019</b>
Expiry Date of the Audit :	<b>Please refer to the producer profile in the amfori BSCI platform</b>
Auditing Company :	<b>TUEV Rheinland</b>
Auditor's Name(s) :	<b>Sam Li(Lead)</b>
Auditing Branch (if applicable) :	<b>TUV Rheinland China</b>

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



Rating	A combination of ratings per Performance Area where:	Consequence
<b>A</b> <b>Very Good</b>	<ul style="list-style-type: none"> <li>Minimum 7 Performance Areas rated A</li> <li>No Performance Areas rated C, D or E</li> </ul> These are three examples: A B B B B A A A A A A A A B B B B B B B B	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
<b>B</b> <b>Good</b>	<ul style="list-style-type: none"> <li>Maximum 3 Performance Areas rated C</li> <li>No Performance Areas rated D or E</li> </ul> These are three examples: A A A A A A B B B B B B B B A A A A A B B B B B B B B C B B B B B B B B B B C C C C	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
<b>C</b> <b>Acceptable</b>	<ul style="list-style-type: none"> <li>Maximum 2 Performance Areas rated D</li> <li>No Performance Areas rated E</li> </ul> These are three examples: A A A A A A A A A C C C C C A A A A A B B B B C C C D C C C C C C C C C C C D D	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
<b>D</b> <b>Insufficient</b>	<ul style="list-style-type: none"> <li>Maximum 6 Performance Areas rated E</li> </ul> These are three examples: A A A A A A A A A A D D D A A A B B B C C C D D D E D D D D D D D E E E E E E	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
<b>E</b> <b>Unacceptable</b>	<ul style="list-style-type: none"> <li>Minimum 7 Performance Areas rated E</li> </ul> These are three examples: A A A A A A E E E E E E E A A B B C D E E E E E E E E E E E E E E E E E E E	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
<b>Zero Tolerance</b>	A Zero Tolerance issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)	Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.

**Main Auditee Information**



Name of producer :	Shenzhen Vstarcam Technology Co., Ltd.		
DBID number :	364932		
Audit ID :	144230		
Address :	4-5th Floor, G Building, Jiangxia Tech Park, Shengping Road, Huangfengling Industrial Zone, Luoazu Community, Shiyan Street, Baoan District, Shenzhen		
Province :	Guangdong	Country :	China
Management Representative :	Yan Lin/ Sales Manager		
Contact person:	Yan Lin	Sector :	Non-Food
Industry Type :	Media and graphical industry	Product group :	Audio, Visual and photography
Product Type :	IP Camera, Smart home, Dash cam		

**Audit Details** 

Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 27/02/2020	

Rating per Performance Area (PA)												
PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	C	A	A	A	D	A	A	A	A	A	B	A

**Executive summary of audit report**

Shenzhen Vstarcam Technology Co., Ltd. (深圳市威视达康科技有限公司) was established on April 13, 2011 (unified social credit code: 9144030057311446X6) and located at 4-5th Floor, G Building, Jiangxia Tech Park, Shengping Road, Huangfengling Industrial Zone, Luozu Community, Shiyan Street, Baoan District, Shenzhen (深圳市宝安区石岩街道罗租社区黄峰岭工业区升平路江峡科技园G栋4楼5楼).

The factory was located inside of the Jiangxia Tech Park; the auditee rented the 4th floor and 5th floor of Building G as production workshop and office, rented the 5th of Building F as warehouse area. The total area used by auditee was around 4700 square meters. The other floors were used by other factories. Which was confirmed via site tour, management interview, worker interview and random interview with security guard of the tech park. The detailed occupancy information was as following: 1) For Building G: 1F: used by one 3D printing company; 2F: used by one Mold production factory; 3F: used by one medical products factory and one embroidery factory; 4F & 5F: audited site. 2) For building F: 1F: used by one technology company; 2F: was idle per onsite tour; 3F: used by one LED company; 4F: used by one photoelectronic products company; 5F: audited site. All the factories had individual business licenses and managed individually. Among the factories, there were no business relations and no sharing workers existed; which was verified via on-site tour, worker interview and management interview.

The main product was IP Camera, Smart home, Dash cam. The main processes were assembly, pad printing, testing, inspection and packing. As per management interview and document review, no obvious peak season was presented in the auditee. All workers were hired by the auditee directly. No dormitory, canteen and transportation were provided by factory.

Private interview was conducted in the facility with 20 workers selected from different departments. The time records were cross-checked against with production records and no inconsistency regarding working hours was found. All interviewed employees had positive attitudes toward the factory management.

The management was cooperative throughout the whole audit, all the area could be accessed and taking photos was allowed. Opening and closing meeting were held with the factory representatives and worker representatives. All of the findings were discussed in the closing meeting. Finally, Yan Lin/ Sales Manager signed the onsite CAP and agreed to take corrective actions.

Remark:

- The indicated work shift for employees in auditee's production structure of Data Evidence was 8:30-17:45. It was because that auditor can't select the work end time of 17:50, so auditor selected 17:45.
- No Comprehensive Working Hour System waiver or social insurance waiver obtained by factory.
- There was no trade union in factory and no collective bargaining agreement available.
- No contractor and agency labor used by factory. No security guards hired by factory. The security guards at entrance was used by the industrial park.
- Agreed by management, the audit on February 27, 2019 was conducted from 8:30am to 12:30pm.
- One trainee from TUV Rheinland joined the audit.

**Ratings Summary**



<b>Auditee's background information</b>			
Auditee's name :	<b>Shenzhen Vstarcam Technology Co., Ltd.</b>	Legal status :	<b>Ltd company</b>
Local Name :	<b>深圳市威视达康科技有限公司 (9144030057311446X6)</b>	Year in which the auditee was founded :	<b>2011</b>
Address :	<b>4-5th Floor, G Building, Jiangxia Tech Park, Shengping Road, Huangfengling Industrial Zone, Luozu Community, Shiyan Street, Baoan District,</b>	Contact person (please select) :	<b>Yan Lin</b>
Province :	<b>Guangdong</b>	Contact's Email :	<b>Sales2@vstarcam.com</b>
City :	<b>Shenzhen</b>	Auditee's official language(s) for written communications :	<b>Chinese</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>N/A</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>http://www.vstarcam.cn</b>
GPS coordinates :	<b>N22°40'2" E113°55'35"</b>	Total turnover (in Euros) :	<b>17000000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>90.00</b>
Industry :	<b>Media and graphical industry</b>	Of which domestic market % :	<b>10.00</b>
If other, please specify :		Production volume :	<b>80000 pieces per month</b>
Product Group :	<b>Audio, Visual and photography</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :		Lost time injury calculation cost :	<b>Yes</b>
Product Type :	<b>IP Camera, Smart home, Dash cam</b>		

<b>Auditee's employment structure at the time of the audit</b>			
Total number of workers :	<b>231</b>	Total number of workers in the production unit to be monitored (if applicable) :	<b>0</b>
	<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>	
Permanent workers	<b>0</b>	<b>0</b>	
Temporary workers	<b>102</b>	<b>129</b>	
In management positions	<b>8</b>	<b>5</b>	
Apprentices	<b>0</b>	<b>0</b>	
On probation	<b>0</b>	<b>0</b>	
With disabilities	<b>0</b>	<b>0</b>	
Migrants (national citizens)	<b>82</b>	<b>93</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>102</b>	<b>129</b>	
Production based workers	<b>0</b>	<b>0</b>	
With shifts at night	<b>0</b>	<b>0</b>	
Unionised	<b>0</b>	<b>0</b>	
Pregnant	<b>-</b>	<b>0</b>	
On maternity leave	<b>-</b>	<b>0</b>	

Finding Report



**Performance Area 1 : Social Management System and Cascade Effect**

Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: D

Deadline date:24/02/2020

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee has established the management system in accordance with the laws and regulations and the amfori BSCI code of conduct to ensure that the factory complies with the relevant requirements. The auditee have also established the mechanism for collecting and updating laws and regulations, and timely collected the laws on labor, business ethics, health and safety and the environment etc. Ms. Yan Lin/ Sales Manager was appointed as the management representative of the social responsibility to implement the amfori BSCI system. Ms. Qunhua Lu/ HR Manager assisted management representative in building social responsibility system. The annual social responsibility internal audit and management review mechanism has been established. The factory asked some major suppliers to sign the social compliance commitment letters and annual social performance assessment to major suppliers were conducted. However, gaps were still noted in implementation.

被审核方按照法律法规和amfori BSCI行为准则建立了一套管理体系来确保工厂遵守相关要求。被审核方也建立了法律法规收集和更新机制,及时收集了关于劳工,商业道德,健康安全和环境等方面的法律。销售经理林艳女士被任命为社会责任管理者代表,负责落实amfori BSCI体系。人事经理陆群花女士协助管理者代表进行社会责任体系的建设。年度的社会责任内审和管理评审机制已经建立。工厂有要求一些主要供应商签订社会责任承诺书,同时工厂有对一些主要供应商开展年度社会责任评审。但是,在实施过程中仍存在差距。

- 1.1 - The factory has established the social responsibility management procedure and has promised to implement it in accordance with the procedure. However, some procedures have not been effectively implemented. For example, in PA2, there were some deficiencies in the implementation of amfori BSCI. In PA5, the coverage of social insurance did not meet the legal requirements. And according to the manager's confirmation, the factory's social insurance policy was voluntary purchase, so the coverage of social insurance was difficult to meet the legal requirements. In PA6, workers worked monthly overtime more than 36 hours. According to management interviews, the factory did not set overtime control plan. In PA7, there were non-conformities in Occupational Health and Safety. In PA12, environmental non-conformities and so on. According to interviews with managements, these deficiencies were caused by management negligence and cost control during the operation.  
工厂建立了社会责任管理程序,并承诺按照程序执行。但是,部分程序并未有效执行。例如:PA2部分,员工参与amfori BSCI的实施存在缺失。PA5部分,社保的覆盖率没有达到法律要求。且根据管理人员确认,工厂的社保政策为自愿购买,所以社保覆盖率很难达到法律要求。PA6部分,工人的月加班时间超过36小时。且根据管理访谈,工厂并未制定加班管控计划。PA7部分,职业健康安全方面的不符合项等。PA12部分,环境部分存在的不符合项等等。根据管理人员访谈,企业在运行过程中由于管理疏忽以及成本管控等原因造成了这些缺失的发生。
- 1.4 - The factory has established the capacity planning process. However, according to attendance records, management and employee interviews found that workers' monthly overtime time systematically exceeded the legal requirements of 36 hours. Managers said that the factory did not establish the pre-warning system for working hours, nor did they formulate the overtime management and control plan. Overtime was based on the principle of voluntariness, and workers also want to work more overtime to earn more money.  
工厂建立了产能规划的程序。但是根据考勤记录,管理和员工访谈发现工人的月加班时间系统性超过法律要求的36小时。管理人员表示,工厂没有建立工时预警系统,也没有制定加班管控计划。加班基于自愿原则,工人也希望多进行加班获取更多收入。

**Remarks from Auditee:**

**Performance Area 2 : Workers Involvement and Protection**

Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: C

Deadline date:24/05/2019

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee has established procedures for employee participation and protection. The auditee provided training on grievance mechanism for all employees. Employees can appeal through suggestion boxes, workers' representatives or direct supervisors. There was no trade union in the factory at present. In October 2018, the factory held the election of workers' representatives, and three employees' representatives were elected. Management and workers' representatives hold quarterly communication meetings. However, gaps were still noted in implementation.

被审核方建立了员工参与和保护的程序文件。被审核方为所有员工提供了关于申诉机制方面培训。员工可以通过意见箱,工人代表或者直接主管进行申诉。工厂目前没有工会。工厂在2018年10月进行了工人代表的选举,一共选举出3名员工代表。管理层和工人代表每季度召开沟通会议。但是,在实施过程中仍存在差距。

- 2.1 - The factory has worker representatives elected by workers as channels of communication between workers and factory. However, about 80% of the employees interviewed said they did not know who was the employee representative. Managers explained that they did not publicize it to new workers.  
工厂有成立工人选举的员工代表作为工人和工厂沟通的渠道。但是,大约80%的访谈的员工表示不清楚谁是员工代表。管理人员解释,他们没有对新入职员工进行这方面的宣传。
- 2.2 - The factory provided the long-term goal of protecting workers. However, according to interviews with workers and worker representatives and documentation, workers and worker representatives were not involved in the formulation of long-term protection goals.  
工厂提供了保护工人的长期目标。但是,根据员工和员工代表访谈以及文件记录,员工及员工代表并没有参与到长期保护目标的制订。
- 2.4 - On-site observation found that the factory workshop had posted the Chinese version of amfori BSCI code of conduct and staff manual, and also provided training records for all employees participated in amfori BSCI. However, about 60% interviewed workers did not know what amfori BSCI was or its basic content, such as fair remuneration. Factory management explained that they did not evaluate the effectiveness of the training.  
现场观察发现工厂车间有张贴中文版amfori BSCI行为准则和员工手册,也提供了所有员工参加amfori BSCI的培训记录。但是,大约60%的访谈的员工不清楚什么是amfori BSCI,也不了解其基本内容如公平报酬等。工厂管理解释他们没有对培训的有效性进行评估。

**Remarks from Auditee:**

<b>Performance Area 3 : The rights of Freedom of Association and Collective Bargaining</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>According to procedural documents, management and employee interviews, the auditee did not restrict workers' right to free association and collective bargaining. There was no collective bargaining agreement between the auditee and the employees, but the auditee has not prevented the employees from negotiating with the factory when they wish. According to employee interviews, workers' representatives will not be discriminated against, and workers' representatives can enter the workshop and communicate with employees at any time.</p> <p>根据程序文件, 管理和员工访谈, 被审核方不限制工人自由结社和集体谈判的权利。被审核方和员工无集体谈判协议, 但被审核方也未阻止员工有意愿的时候和工厂谈判。根据员工访谈, 工人代表不会受到歧视, 工人代表可以随时进入车间和员工沟通。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 4 : No Discrimination</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has formulated the anti-discrimination policy, which stipulated that the factory will not treat employees differently because of race, gender, age and other reasons. In addition, according to worker and management interviews, if employees' rights are infringed, employees can make real name or anonymous complaints through the complaint mechanism in the factory.</p> <p>被审核方制定了反歧视的政策, 政策规定工厂不会因为种族, 性别, 年龄等原因对员工区别对待。并且根据员工和管理访谈, 如果员工的权利受到侵害, 员工可以通过工厂内部的申诉机制进行实名或者匿名投诉。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 5 : Fair Remuneration</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:24/02/2020
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has established policies and procedures concerning wages and benefits. The local minimum wage was RMB 2130 yuan per month from June 1, 2017 to June 30, 2018. After July 1, 2018, it was RMB 2200 yuan per month. Employees were paid by hourly rate, the minimum monthly wage was RMB 2350 yuan (equivalent to RMB 13.51 yuan per hour), which was higher than the local minimum wage standard. Wages were paid by Bank of China transfer before the 12th of each month. The latest paid month was January 2019. The factory provided wage records from February 2018 to January 2019. March 2018, November 2018 and January 2019 were the main sampling months. No unreasonable deductions and late payment were found. However, gaps were still noted in implementation.</p> <p>被审核方建立了工资福利方面的政策和程序。当地最低工资在2017年6月1日至2018年6月30日为人民币2130元每个月。在2018年7月1日以后为人民币2200元每个月。员工实行时薪制, 每个月最低工资为人民币2350元(等于人民币13.51元每小时), 高于当地最低工资标准。工资每个月12号前通过中国银行转账方式发放。最近工资发放月是2019年1月。工厂提供了2018年2月至2019年1月的工资记录。2018年3月, 2018年11月和2019年1月作为主要抽样月份。没有发现不合理扣款和工资迟发的情况。但是, 在实施过程中仍存在差距。</p> <p>5.5 - There were 231 workers at factory currently (include 2 new workers and no retired employees). The recent one year's social insurance records on the factory social security bureau's website were checked. According to the social insurance records of February 2019, total 179 workers joined the retirement insurance, medical insurance, work injury insurance, maternity insurance and unemployment insurance. There were still 50 workers did not join the social insurance. Managers explained that social insurance was purchased voluntarily. According to interviews with workers, some workers think that social security was useless, and some workers joined the new rural insurance in their hometown, so they were unwilling to participate in the social insurance. The factory did not count how many employees had purchased new insurance in their hometown. Remark: The factory provided group accident injure commercial insurance from Ping'an Insurance Company for employees who did not participate in social insurance, which was valid from September 21, 2018 to September 20, 2019. Reference Law: PRC Labour Law Article 72&amp;73.</p> <p>工厂目前一共有231名员工(包括2名新入职员工, 没有退休员工)。查看了工厂社保局网上最近一年的参保记录, 根据2019年2月的参保记录显示一共有179名员工参加了养老保险, 医疗保险, 工伤保险, 生育保险和失业保险。仍有50名员工未参加社保。管理人员解释, 社保是自愿购买。根据工人访谈, 一部分工人认为社保没用, 一部分工人在老家有新农保, 所以不愿意参保。工厂并没有统计有多少员工在老家购买了新农保。备注: 工厂有为所有未参加社保的员工购买平安保险公司的团体意外伤害商业险, 有效期从2018年9月21日至2019年9月20日。参考法规:《中华人民共和国劳动法》第七十二&amp;七十三条。</p>	
<b>Remarks from Auditee:</b>	

Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: D

Deadline date:24/02/2020

GOOD PRACTICES:

AREAS OF IMPROVEMENT:

The auditee has formulated policies and procedures regarding working hours. The factory had no obvious peak or low season. The factory's regular working hours were from Monday to Friday, with employees working eight hours a day. Employees used fingerprint recognition system to record workers' working hours. All employees were on one shift: 8:30-12:00; 13:20-17:50. Night overtime was usually from 18:30-20:30, about five times a week. Overtime on Saturdays was usually 10 hours, four to five times a month. Sunday was the rest day and no overtime will be arranged. The factory provided attendance records from February 2018 to February 27, 2019. March 2018, November 2018 and January 2019 were the main sampling months. Twenty workers were randomly sampled from different departments each month. During the sampling month, workers worked maximum 2 hours overtime per day, 20 hours per week and 94 hours per month. However, gaps were still noted in implementation.

被审核方制定了工时方面的政策和程序。工厂没有明显的淡旺季。工厂正班工作时间从周一到周五，员工每天上班8小时。员工用指纹识别方式记录工人工作时间。所有员工均为一个班次：8:30-12:00；13:20-17:50。晚上加班一般为18:30-20:30，每周大概5次。周六加班一般为10小时，每月4到5次。星期日为休息日，不会安排加班。工厂提供了2018年2月至2019年2月27日的考勤记录。2018年3月，2018年11月和2019年1月作为主要抽样月份。每个月从不同部门随机抽取20名工人作为样本。在抽样月份里，工人每天最大加班2小时，每周最大20小时，每个月最大94小时。但是，在实施过程中仍存在差距。

6.2 - As per the reviewed time records from February 2018 to February 27, 2019. There was no obvious and peak season in the facility. 20 sampled employees' time records were selected in March 2018, November 2018 and January 2019 respectively. The samples and the detailed overtime hours were as below: All 20 sampled employees' monthly overtime hours in March 2018 were exceed 36 hours, which up to 94 hours. All of 20 sampled employees' monthly overtime hours in November 2018 were exceed 36 hours, which up to 84 hours. All 20 sampled employees' monthly overtime hours in January 2019 were exceed 36 hours, which up to 76 hours. Managers said that the factory did not establish the pre-warning system for working hours, nor did they formulate the overtime management and control plan. Overtime was based on the principle of voluntariness, and workers also want to work more overtime to earn more money. Thus, workers conducted excessive monthly overtime systematically exceeding local law requirement in the reviewed months. As per workers statement, overtime work was voluntary and they could refuse to work overtime and no punish for the refuse of overtime. They did not know the upper limit of the overtime working. Remark: The maximum monthly overtime hours in February 2019 (till February 27, 2019) were up to 42 hours. Reference Law: PRC Labour law, Article 41. 根据2018年2月至2019年2月27日的考勤，工厂没有明显的淡旺季。2018年3月，2018年11月，2019年1月分别抽了20名员工，加班情况如下：2018年3月份所有20名抽样员工月加班超过36小时，最大为94小时，2018年11月份所有20名抽样员工月加班超过36小时，最大为84小时，2019年1月份所有20名抽样员工月加班超过36小时，最大为76小时。管理人员表示，工厂没有建立工时预警系统，也没有制定加班管控计划。加班基于自愿原则，工人也希望多进行加班获取更多收入。因此，员工在查看的月份都加班系统性超过法律要求。受访的工人称加班是自愿的，可以拒绝加班，没有因此受到惩罚。不清楚加班上限值。备注：2019年2月（至2019年2月27日）最大月加班小时为42小时；参考法律《中华人民共和国劳动法》第四十一条。

Remarks from Auditee:

<b>Performance Area 7 : Occupational Health and Safety</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:24/07/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has formulated health and safety policies and procedures. The factory has set up the EHS Committee. Mr. Qiang Ke/Production Supervisor was responsible for health and safety issues. The factory have conducted the risk assessments for workplaces, production equipment, special populations and infectious diseases. At the same time, the factory has taken effective measures to prevent workers from injuries. The factory conducted regular health and safety training for all employees, including position operations, first aid knowledge, emergency procedures, fire drills and chemical use, etc. Each workshop was equipped with sufficient safety exits and fire fighting equipment, including fire extinguishers, fire hydrants and fire alarms. All fire fighting equipment was properly placed, checked regularly and clearly marked. There were six qualified first aid workers in the factory. Each workshop was equipped with the first aid kit. Clean drinking water was also provided for workers. The toilets were in good condition and workers can use the toilets freely during working hours. Remark: The factory did not provide dormitory, canteen and transportation for workers. However, gaps were still noted in implementation.</p> <p>被审核方制定了健康安全方面的政策和程序。工厂成立了环境健康安全委员会，柯强先生/生产主管负责健康安全方面的事宜。工厂有针对工作场所、生产设备、特殊人群和传染性疾病预防等进行风险评估。同时工厂采取了有效措施防止员工发生工伤。工厂对所有员工定期进行关于健康安全的培训，包括岗位操作、急救知识、应急程序、消防演习和化学品使用等等。每个车间均配备了足够的安全出口和消防设备包括灭火器、消防栓和消防警铃。所有消防器材都有恰当摆放、定期检查并且清楚标识。工厂一共有6名合格的急救人员，每个车间有提供急救药箱。干净的饮用水也有为工人提供。洗手间卫生条件良好，工人可以在上班期间自由使用洗手间。备注：工厂没有为工人提供宿舍、食堂和交通工具给工人。但是，在实施过程中仍存在差距。</p>	
7.1 -	As per the management and worker interview, the factory did not provide the pre-job, in-service and post-service occupational diseases examination for workers exposed to occupational hazards position(e.g. soldering workers contact with dust and pad printing worker contact with chemicals). Reference law: Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35 根据管理和员工访谈发现，工厂没有为从事有职业病危害工种的人员提供岗前、在岗和离岗职业健康体检：如：焊锡工人接触烟尘，移印工人接触化学品等。参考法律法规：《中华人民共和国职业病防治法》第三十五条
7.6 -	Based on the onsite observation, employee and management interview. The soldering workers were only provided with normal Disposable Face Mask, rather than anti-dust mask. Reference Law: Production Safety Law of the People's Republic of China, Article 23. 基于现场观察，员工和管理访谈，焊锡员工只提供了普通的一次性口罩，而不是防尘口罩。参考法律法规：《中华人民共和国安全生产法》第二十三条
7.7 -	1. Site tour found that the chemical containers such as alcohol container used in the assembly workshop was posted with only content label rather than safety label. Reference law: Article 14 of the Regulation For Chemical Usage Safety in Work Place. 2.As per site observation, smoke dust was generated from the process of soldering in assembly line. The factory did not install local exhaust dust removal equipment to control the smoke dust. Reference Law: Hygienic standards for the design of industrial enterprises (GBZ 1-2010) 6.1.1 1.现场审核发现装配车间使用的化学品瓶装容器如酒精容器只张贴了内容标识，而不是安全标签。参考法规：《工作场所安全使用化学品规定》第14条。2.根据现场观察，装配线上焊锡工序会产生烟尘。工厂未安装局部排风除尘设备来控制烟尘。相关法规《工业企业设计卫生标准》(GBZ 1-2010) 6.1.1
7.16 -	According to the on-site observation, the packing material goods and finished goods on 5F of building F were stored against to the wall. The distance between the walls was less than the legal requirements of 0.5 meters. Reference law: General rules for fire safety management of storage occupancies (GA 1131-2014), 6.8. 根据现场观察，工厂F栋五楼仓库存放的包材和成品均靠墙，与墙的距离小于法律规定的0.5米。参考法律：《仓储场所消防安全管理通则》(GA 1131-2014), 6.8。
<b>Remarks from Auditee:</b>	
<b>Performance Area 8 : No Child Labour</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has formulated appropriate recruitment procedures. Each worker was required to provide the original identity card for check at the time of entry. When the recruiter has doubts about the age of the employee, he/she will verify the employee through skilled interviews. In addition, the auditee has also formulated remedial measures for child labour to prevent misrecruitment. During the audit process, no child labor was found by reviewing the personnel information of all employees, on-site inspection, worker and management interviews.</p> <p>被审核方制定了合适的招聘程序。每个工人在入职时均需要提供身份证原件以供审查。当招聘专员对员工的年龄有怀疑时，会通过有技巧地访谈以核实员工情况。此外，被审核方也制定了童工补救措施以防止误招童工。在审核过程中，通过查阅所有员工的人事资料，现场巡查，员工和管理访谈，未发现有任何童工存在。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 9 : Special protection for young workers</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has formulated the management procedures for young workers. The managements know how to protect young workers in accordance with regulations. The factory will not arrange for young workers in jobs with occupational hazards such as soldering and pad printing. In addition, the factory also conducted the risk assessment for young employees. During the audit process, no young workers were found by reviewing the personnel information of all employees, on-site inspection, worker and management interviews.</p> <p>被审核方制定了未成年工的管理程序。管理人员了解如何依照法规要求保护未成年工。工厂不会安排未成年工在存在有职业危害因素岗位如焊锡和移印等岗位。此外，工厂也对未成年员工进行了风险评估。在审核过程中，通过查阅所有员工的人事资料，现场巡查，员工和管理访谈，未发现有任何未成年员工存在。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 10 : No Precarious Employment</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:24/05/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>All workers were recruited directly by the factory. Workers will sign the labor contract with the factory on the day of entry, and they will keep one copy of the contract. The establishment of employment relationship did not cause insecurity of workers. There was no evidence to show the factory tried any unfair employment method to reduce its obligations. However, gaps were still noted in implementation.</p> <p>所有工人都是工厂直接招聘的。工人在入职当天会与工厂签订劳动合同，同时自己会保留一份合同副本。建立劳动关系不会给员工带来不安全地位。未有任何证据显示工厂有通过不公平的雇佣方式去减少其义务。但是，在实施过程中仍存在差距。</p> <p>10.2 - As per the labor contract review, employee and management interview, it was noted that no occupational hazards notification for relevant operators was in place, such as soldering and pad printing workers exposed to dust and chemicals. Reference Law: People's Republic of China on Prevention and Control of Occupational Diseases Article 33.</p> <p>根据工人劳动合同审核，员工和管理访谈发现，工厂没有对有害岗位进行职业危害告知，如焊锡和移印岗位员工接触烟尘和化学品。参考法律法规：中华人民共和国职业病防治法第三十三条。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has formulated the procedure of anti-forced labor. The disciplinary policies of factory also meet the requirements of laws and regulations. According to on-site observation, worker and management interviews, there has been no situation of forced labor, and employees have not encountered any humiliation or inhuman treatment. Employees can resign in accordance with the regulations without being deducted from their wages, and they can leave the factory freely.</p> <p>被审核方制定了反强迫劳动的程序。工厂的惩戒政策也是符合法律法规要求。根据现场观察，员工和管理访谈，没有发生过强迫劳动的情况，员工也未遇到任何被侮辱或非人道的待遇。员工可以按照规定提出辞职而不会被克扣工资，并且可以自由离开工厂。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: B	Deadline date:24/12/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee has established principles and policies on environmental protection. In addition, the auditee have collected environmental laws and regulations and regularly updated them. The factory has obtained the EIA report and the EIA approval. The factory did not produce production waste water. Soldering and pad printing in factory would produce organic waste gases. The factory regularly monitored exhaust gas and boundary noise. Hazardous wastes such as empty chemical barrels and chemical-contaminated rags would produce in factory. The factory did not need to apply for the pollution discharge permit, so 12.3 was not applicable. However, gaps were still noted in implementation.</p> <p>被审核方建立了环境保护方面的方针政策。此外，被审核方也收集了环境方面的法律法规并且定期更新这些法规。工厂有取得环评报告和环评批复。工厂没有生产废水产生。工厂的焊锡和移印会产生有机废气。工厂有定期对废气和厂界噪音进行监测。工厂会产生危险废弃物如化学品空桶和沾染化学品的抹布等。工厂不需要取得排污许可证，所以12.3不适用。但是，在实施过程中仍存在差距。</p> <p><b>12.1 -</b> 1. According to the document and onsite tour, the EIA indicated that the business operation was at 4-5F of the building G, but didn't include the 5F of the building F. The management explained that the 5F of building F was rented later. Reference Law: Law of the People's Republic of China on Appraising of Environment Impacts, Article 24. 2. The factory provided the EIA and EIA approval documents. But the factory can't provide the approval document for on-site inspection and acceptance of completed environmental protection facilities for review. Reference Law: Management Regulations for Environmental Protection of Construction Projects, Article 17</p> <p>1. 根据文件和现场观察，环境影响评估报告显示工厂运营是在G栋4-5楼，但是没有包括F栋5楼。管理人员解释，F栋5楼是后面租赁的。参考法规：《中华人民共和国环境影响评价法》，第24条 2. 工厂提供了环评报告和环评批复文件，但是工厂未能提供建设项目竣工环境保护验收文件。参考法规：《建设项目环境保护管理条例》第十七条</p> <p><b>12.4 -</b> 1. Onsite tour found that some empty chemical containers such as lubricating oil and glue container stored in open air on the building roof. Reference law: Standard of pollution control on hazardous waste storage GB18597-2001, Article 6.3.9 2. There was no evidence showed that the factory has entrusted a qualified third party agency to recycle hazardous waste generated within the factory. The factory also did not provide records of the disposal and transfer of hazardous wastes in the past one year. Reference law: PRC Prevention and Control of Environmental Pollution by Solid Waste Law (1995) Amendment (2016), Article 57</p> <p>1. 现场审核发现，部分化学品空桶如润滑油和胶水桶露天存放在楼顶。参考法律：《危险废物贮存污染控制标准（GB18597-2001）》第6.3.9条 2. 没有证据表明工厂有委托有资质的第三方机构来回收工厂内部产生的危险废弃物。工厂也没有提供近一年度危险废弃物的处理和转移等记录。参考法律：《中华人民共和国固体废物污染环境防治法》第五十七条</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - 144230] Audit Date: 25/02/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee have established anti-bribery and anti-corruption procedures. And the auditee also carried out anti-bribery risk assessment. The auditee regularly conducted business ethics training for all employees. During the audit period, no inconsistent and false information was found through cross-validation with production records, attendance records and interviews with employees. Production records including warehouse in and out records, finished product inspection records, daily test reports and other records have been collected and provided for review.</p> <p>被审核方已建立了反贿赂和反腐败程序。并且被审核方也进行了反贿赂风险评估。被审核方定期对所有员工进行商业道德培训。在审核期间，通过与生产记录，考勤记录和员工访谈交叉验证确认，未发现不一致和虚假的信息。生产记录包括仓库出入库记录，成品检验记录，测试日报表等记录已经收集并提供审阅。</p>	
<b>Remarks from Auditee:</b>	

**Summary**



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	25/02/2019	144230	D	C	A	A	A	D	A	A	A	A	A	B	A	C

**Producer Photos**



External photo(s) of the production unit(s)  
Production building outlook and factory name.jpg



Photo of non-conformity  
NC 12.4 Empty chemical containers stored in open air.jpg



Photo of the inside of the main production hall  
Office.jpg



Photo first aid facilities  
First aid kits.jpg

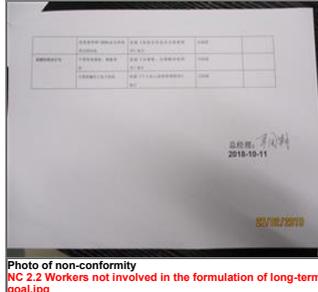


Photo of non-conformity  
NC 2.2 Workers not involved in the formulation of long-term goal.jpg



Photo of the inside of the main production hall  
Packing line.jpg



Photo of chemical storage room (if applicable)  
Chemical with secondary container.jpg



Photo of non-conformity  
NC 5.5 Insufficient social insurance coverage.jpg



Photo of the inside of the main production hall  
Pad printing.jpg

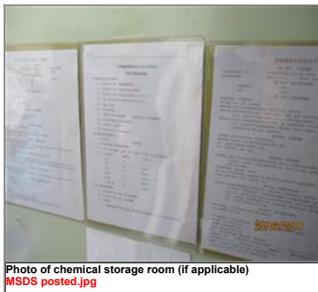


Photo of chemical storage room (if applicable)  
MSDS posted.jpg

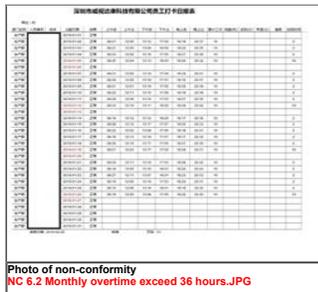


Photo of non-conformity  
NC 6.2 Monthly overtime exceed 36 hours.JPG



Photo of the inside of the main production hall  
Reception area.jpg



Photo of fire safety equipment  
Emergency exit with exit sign and emergency light.jpg



Photo of non-conformity  
NC 7.16 Materials stored against wall.jpg



Photo of the inside of the main production hall  
Suggestion box.jpg



Photo of fire safety equipment  
Evacuation plot plan.jpg



Photo of non-conformity  
NC 7.6 and 7.7 Worker with improper mask and No LEV.jpg



Photo of the inside of the main production hall  
Testing.jpg



Photo of fire safety equipment  
Evacuation signs in staircase.jpg



Photo of non-conformity  
NC 7.7 Chemicals not with safety label.jpg



Photo of the inside of the main production hall  
Time records machine.jpg



Photo of fire safety equipment  
Evacuation signs in warehouse.jpg



Photo of the code of conduct on display  
Posted amfori BSCI COC.jpg



Photo of the inside of the main production hall  
Warning sign.jpg



Photo of fire safety equipment  
Fire extinguisher.jpg



Photo of the inside of the main production hall  
Aging room.jpg



Photo of the sanitary facilities  
Drinking water.jpg



Photo of fire safety equipment  
Fire hydrant and fire alarm.jpg



Photo of the inside of the main production hall  
Assembly.jpg



Photo of the sanitary facilities  
Restroom with suppliers.jpg



Photo of fire safety equipment  
Fire hydrant tested.jpg



Photo of the inside of the main production hall  
Finished goods warehouse.jpg



Photo of the sanitary facilities  
Restroom.jpg

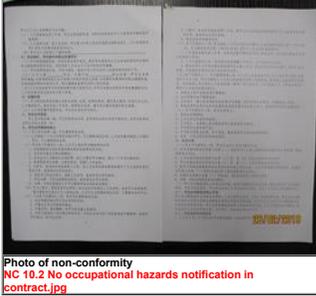


Photo of non-conformity  
NC 10.2 No occupational hazards notification in contract.jpg