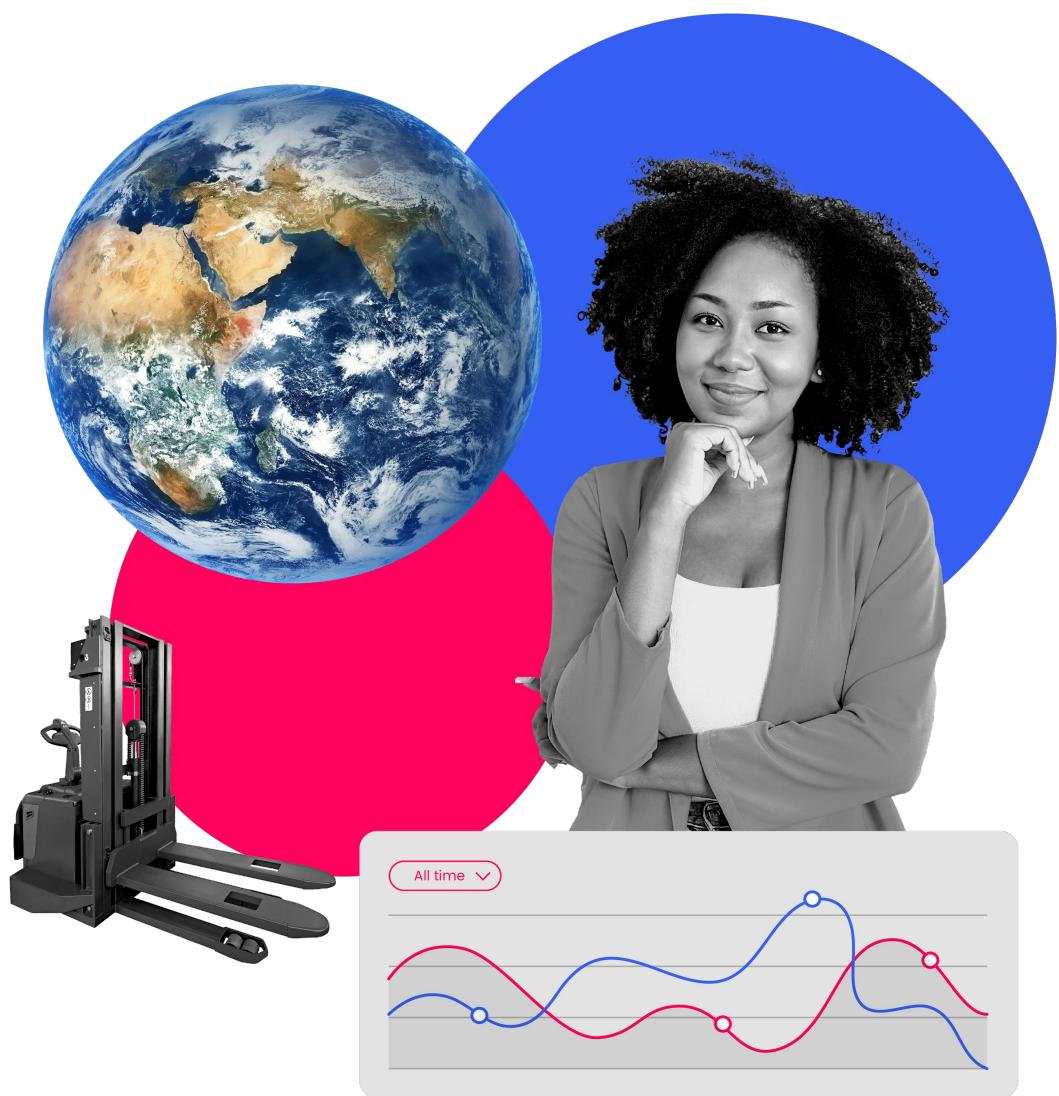




Sedex Members Ethical Trade Audit

# Sedex Members Ethical Trade Audit Report

Version 7



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Attachments

# Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & 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 following Code Areas:

## Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & 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
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

## Included in a 4-Pillar audit:

1. Labour Standards Code Areas
  - As 2-pillar
2. Health & Safety Code Area
  - As 2-pillar
3. Environment Code Area:
  - 10.A: Environment 2-Pillar
  - 10.B: Environment 4-Pillar
4. Business Ethics Code Area:
  - 10.C: Business Ethics

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- (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 and site details

## Audit details

<b>Sedex company reference</b>	ZC422130828	<b>Auditor company name</b>	LRQA
<b>Date of audit</b>	2024-11-12	<b>Audit conducted by</b>	Sedex member
<b>Audit pillars</b>	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

## Site details

<b>Sedex site reference</b>	ZS422130830	<b>Site name</b>	Shenzhen Jiewill Electronics Co Ltd
<b>Business name</b>	Shenzhen Jiewill Electronics Co Ltd	<b>Site address</b>	518107 101,201,No.2 XINYI STREET, DONGKENG COMMUNITY, FENGHUANG STREET, GUANGMING DISTRICT, SHENZHEN 深圳市光明区凤凰街道东坑社区新亿街2号 101、201, SHENZHEN, CN
<b>Site phone</b>	13631779965	<b>Site email</b>	Tony_Leung@fullwilltech.com

## Audit parameters

<b>Time in and out</b>	Day 1
In	09:10
Out	16:00
<b>Audit type</b>	Full initial
<b>Was the audit announced?</b>	Semi announced
<b>Was the Sedex SAQ available for review?</b>	Yes
<b>Who signed and agreed CAPR?</b>	Mr. Liang Huatao / DGM
<b>Any conflicting information SAQ/Pre-Audit Info</b>	No
<b>Is further information available?</b>	No

## Audit attendance

	Senior management	Worker representative	Union representative
<b>A: Present at the opening meeting?</b>	Yes	Yes	No
<b>B: Present at the audit?</b>	Yes	Yes	No
<b>C: Present at the closing meeting?</b>	Yes	Yes	No
<b>Reason for absence at the opening meeting</b>	No Union in the factory		
<b>Reason for absence during the audit</b>	No Union in the factory		
<b>Reason for absence at the closing meeting</b>	No Union in the factory		

# SMETA declaration

## Auditor team

### SMETA declaration

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

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

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

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

Nil

Lead auditor	Siren Liu	APSCA Number	21705589
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Additional auditor	Darren Dai	APSCA Number	21701160
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Date of declaration	2024-11-12
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## Site representation

<b>Declaration</b>	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.
<b>Full name</b>	Mr. Liang Huatao
<b>Title</b>	DGM
<b>Date of declaration</b>	2024-11-12

## Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600699421</a>
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§2	NC <a href="#">ZAF600699422</a>
3. Working conditions are safe and hygienic	3.R Provide clean and secure toilets, wash ar...	§3	NC <a href="#">ZAF600699423</a>

## Local law issues

- 
- |    |   |
|----|---|
| §1 | In accordance with Article 18 of Rules for Warehouse Fire Prevention Safety Management: The goods in warehouse should be classified for storage. The area occupied by any single stack should 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.   |
| §2 | In accordance with Social Insurance Act of the People's Republic of China, article 2, the state establishes basic pension insurance, basic medical insurance, occupational injury insurance, unemployment insurance, maternity insurance to form the social security system, to protect citizens' right to receive material assistance from the state and society in accordance with the law from old age, illness, work injury, unemployment, childbirth, etc.<br>Article 4. Employers and employees within the territory of the People's Republic of China should pay social insurance premiums in accordance with the law. |
| §3 | In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.   |
-

# 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

	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	ZC422130828	
Sedex site reference	ZS422130830	
Company name	Shenzhen Jiewill Electronics Co Ltd	
Business ownership type	GOODS	
Site name	Shenzhen Jiewill Electronics Co Ltd	
Site name in local language	深圳市杰为电子有限公司	
GPS location	<b>GPS address</b> 101,201,No.2 XINYI STREET, DONGKENG COMMUNITY, FENGHUANG STREET, GUANGMING DISTRICT, SHENZHEN	<b>Coordinates</b> Latitude: 22.665465 ; Lonitude: 114.19956
Is the worksite in a remote location, far from habitation?	No	
Site contact	<b>Contact name</b> Mr. Liang Huatao <b>Job title</b> DGM <b>Phone number</b> 13631779965 <b>Email</b> Tony_Leung@fullwilltech.com	
Applicable business and other legally required business license numbers and documents	Business license number: 91440300MA5HAEWAX2. Valid date: Apr 27, 2022 to long term	

## Site activities

Site function	Finished Product Supplier
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## Site activities

<b>Site activities</b>	<b>Primary</b>	Manufacture of consumer electronics
	<b>Secondary</b>	
	<b>Other</b>	
<b>Product type</b>	electronic products (such alarm clock etc)	
<b>Process overview</b>	The factory specialized in manufacturing of electronic products (such alarm clock etc). The main production processes included: assembly, inspection and packing. There were 3 production lines in the factory and the main equipment included: assembly	
<b>What level of mechanization best describes the work at this site?</b>	Fair mechanisation / manual Labour	

## Site scope

<b>Is the audited site a physically continuous area?</b>	Yes	
<b>What is the area of audited site to its boundary?</b>	1649m <sup>2</sup>	
<b>Building 1</b>	<b>Last construction works on site</b>	2007
	<b>If building is shared, provide details</b>	Nil
	<b>Number of floors</b>	2
	<b>Description of floor activities</b>	1F: warehouse 2F: assembly, inspection and packing
<b>Is there any difference between the site scope of the audit and the Sedex site profile?</b>	No	
<b>Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?</b>	No	
<b>Is any activity conducted onsite not included within the scope of the audit?</b>	No	

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable No dormitory

## Work patterns

Approximate workers on site per month (% of peak)	January	75-90%	February	50-75%
	March	75-90%	April	75-90%
	May	75-90%	June	75-90%
	July	75-90%	August	75-90%
	September	75-90%	October	75-90%
	November	75-90%	December	75-90%

Is there any night or back shift work at the site?	No
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## 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?	Yes  The factory has conducted those negative impacts assessment each year in their internal audit.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes  The factory had established and implemented Human Rights Impact Assessment system and conducted the HRIA once per year in their internal audit.

# Worker analysis

Gender disaggregated data available Men and women

## Worker totals

	Men	Women	Other	Total
<b>Number of workers</b>	10 (35.7%)	18 (64.3%)	- -	28 (100%)

## Workers by type

	Men	Women	Other	Total
<b>Permanent workers (employees)</b>	10 (35.7%)	18 (64.3%)	- -	28 (100%)
<b>Temporary or fixed term employees</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Agency or subcontracted workers</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Seasonal workers</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Self-employed workers</b>	10 (35.7%)	18 (64.3%)	- -	28 (100%)
<b>Informal workers including home workers</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Apprentices, trainees or interns</b>	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Migrant workers

	Men	Women	Other	Total
<b>Domestic migrant workers</b>	9 (32.1%)	14 (50%)	- -	23 (82.1%)
<b>International migrant workers</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Total migrant workers</b>	9 (32.1%)	14 (50%)	- -	23 (82.1%)

\* % of total workforce

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

The ethnic background of all management and production workers was mainland Chinese, 82% workers were migrated from other provinces of Guangxi, Guizhou etc. All workers were recruited directly by the factory.

## Workers by age

	Men	Women	Other	Total
<b>18 - 24 years old</b>	1 (3.6%)	1 (3.6%)	- -	2 (7.1%)
<b>15 - 17 years old</b>	0 (0%)	0 (0%)	- -	0 (0%)
<b>Under 15 years old</b>	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

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

**Describe how this may vary during peak periods** There was no obvious peak or non-peak month in the factory.

**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	46%	54%	-	100%

## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	10 (35.7%)	18 (64.3%)	- -	28 (100%)
Salaried workers	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	10 (35.7%)	18 (64.3%)	- -	28 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details      Nil

## People in managerial, supervisorial and administrative roles

	<b>Men</b>	<b>Women</b>	<b>Other</b>	<b>Total</b>
<b>Employees in management positions</b>	1 (3.6%)	2 (7.1%)	- -	3
<b>Supervisors or team leaders</b>	5 (17.9%)	1 (3.6%)	- -	6
<b>Administrative staff</b>	5 (17.9%)	3 (10.7%)	- -	8

# 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
<b>Number of workers</b>	-	-	-	-
<b>Were any of the audit findings attributable to the survey?</b>				
<b>Was the interview sample representative of all types of nationality and employment types of workers?</b>	Yes			
<b>Was the interview sample representative of the gender composition of the workforce?</b>	Yes			
<b>Number and size of group interviews</b>	1 group of 5 workers each			
<b>Did workers understand the purpose of the audit?</b>	Yes			
<b>Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?</b>	Yes			
<b>Was there any indication that workers had been 'coached' in how they should respond to questions?</b>	No			
<b>What was the general attitude of the workers towards their workplace?</b>	Favorable			

## Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) Nil
What did the workers like the most about working at this site?	Freedom of movement Job security
Additional comments	Monthly wage could be paid on time and workers could easily leave even during working day.
Attitude of workers' committee/union representatives	The workers representative attended the whole assessment process. They were open to assessor. They stated that they were elected by workers. Workers could raise suggestion or complaint through workers representative meeting. They would participate in grievance solution.
Attitude of managers	Factory management were cooperative with LRQA staff and provided full access to the whole facility. Management provided required documents and records in time, accompanied assessors with factory tour and helped select workers for interviews. Management staff attended the closing meeting, confirmed all the findings and signed on the CAPR without any argument.

## 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 by group/individual

<b>Workers interviewed in groups</b>	1	4	-	5
<b>Workers interviewed individually</b>	1	4	-	5

## Migrant workers interviewed

	Men	Women	Other	Total
<b>Domestic migrant workers interviewed</b>	1	1	-	2
<b>International migrant workers interviewed</b>	1	7	-	8
<b>Total migrant workers interviewed</b>	2	8	-	10

# Measuring workplace impact

Gender disaggregated data available Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

\* 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)	1.0%	1.0%	-	2.0%
Last full calendar year (2023)	1.0%	1.0%	-	2.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

\* Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)\* number available workdays in the year\*100

Are accidents recorded? Yes

No accident occurred in the factory during last year.

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

	Men	Women	Other	Total
Audit company: LRQA	0	0	0	0

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

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	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 standard hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

### Percentage of workers that work on average more than 60 standard hours in a given week

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

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Percentage of workers that work on average more than 60 standard hours in a given week

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	<p>The factory has established written policy and procedures to meet the Code, human rights and labor standards required by local law and customers. Mr. Liang Huatao/DGM was responsible for compliance with the Code, human rights and labor standards to all appropriate parties, including its own suppliers, and the implementation, communication to all employees through trainings, handbooks and postings at the facility.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1. Business license</li> <li>2. Employee Handbook</li> <li>3. Factory Manual contains details of Code and labour standards required by local law and customers.</li> <li>4. The written policy including human rights.</li> <li>5. Appointment book of person responsible for implementing standards concerning Human rights</li> <li>6. Factory rules</li> <li>7. Social compliance management handbook</li> <li>8. Training records of the Code, social compliance, human rights</li> <li>9. Employee interview, employees could raise the human rights issues by suggestion box confidentially or call the hotline to the management who was responsible for implementing standards concerning Human rights directly.</li> </ul>		

## 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

Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review? 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	Auditor found that the facility had established employment management procedure, and it was implemented properly.

## Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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

The factory has established hiring policy and hiring procedures in place. Mr. Liang Huatao, DGM was familiar with local law regarding prison labor, deposit, and wages deductions etc. Workers are not required to stay at the factory if they do not want to, and overtime is voluntary as well. No deposits or any original ID are required to be detained during employment. Resignation is free and wages are paid to resigned workers on time after reasonable notice (usually 30 days in advance).

1. The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification.
2. The employees obtained their job by friend's recommendation or by the factory recruitment.
3. Workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
4. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours.
5. No forced, bonded or involuntary prison labor was identified during the audit.

**Details:**

The facility's policy to ensure employment is freely chosen was reviewed. The policy includes the following clause: the facility does not require deposit or withhold employees' ID cards; the facility does not limit the employees' freedom; there is no forced, bonded, or involuntary prison labor; and employees are free to leave their employer after reasonable notice.

Labor contracts with notice periods.

Training of forced, bonded or involuntary prison labor for all employees at the time employee, and re-fresh training was conducted once per year for all employees. As per workers interview, it was noted that they are free to leave their working stations once their shifts end; all overtime workings were voluntary; and they are not required to pay any 'deposits' or leave their ID cards.

1. Employees' manual, Factory rules
2. Personnel files records
3. Resignation records
4. Management and worker interview.

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## 1. Employment is freely chosen

### Data points

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

Does the site utilise any workers who are prisoners? No

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

## 1.A. Responsible recruitment and entitlement to work

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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	Auditor found that the facility had established employment management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>The factory had established the effective employment policies &amp; program to meet the Code and labor standards required by local law and customers. Mr. Liang Huatao/DGM was responsible for compliance with the Code implementation and the Code was communicated to all employees through trainings, handbooks and postings at the facility.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1. Employees' manual, Factory rules</li> <li>2. Personnel files records</li> <li>3. Training records</li> <li>4. Labor contracts</li> <li>5. Management and worker interview</li> </ul>		

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

<b>Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?</b>	Workers are recruited, selected, and hired directly by our company
<b>How do the labour providers recruit and hire workers?</b>	N/A - Recruitment providers not used
<b>Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?</b>	0
<b>Are there any subcontracted workers (including dispatched labour) on site?</b>	No
<b>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?</b>	Not Applicable
<b>Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?</b>	Not Applicable

#### Migrant workers

<b>Do any workers migrate across international borders to work at this site?</b>	No
<b>Percentage of workers that are migrant</b>	0%
<b>Do any workers migrate from other states, provinces or regions within the country to work at this site?</b>	Yes
<b>List the sending states/provinces/regions</b>	The ethnic background of all management and production workers was mainland Chinese, 82% workers were migrated from other provinces of Guangxi, Guizhou etc. All workers were recruited directly by the factory.

## 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

There was no such cost during employment as per interview.

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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	Auditor found that the facility had established freedom of association and right to collective bargaining management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings
Systems and evidence examined to validate this code section	<p>The factory has written policy on freedom of association, which states that workers are free to form any union or any form of other workers organization in the facility. Currently, no labor union was established in the factory. There was no collective bargain agreement signed in the factory. A worker committee was available, 1 worker representatives were selected by workers. All employees have the right to join worker committee. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. The workers could raise any issue or express their concerns through suggestion box. There was a relevant written policy / procedure documented in place. The meeting between factory management and worker committee was conducted quarterly.</p> <p>Details:</p> <ol style="list-style-type: none"> <li>1.The policy on freedom of association</li> <li>2.Worker representative elected records</li> <li>3.Interview with workers committee members</li> <li>4.Management and worker interview</li> </ol>		



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

### Data points

Are trade unions allowed by law in the national context?	No
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?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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	Some Improvements Recommended
Explanation for management systems grades	Auditor found that the facility had established Environment, Health and Safety management procedure onsite, however it was not implemented properly, and related findings were raised.

#### Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.R Provide clean and secure toilets, wash ar...	§1	NC <a href="#">ZAF600699423</a>

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

The facility generally provided an adequate work environment and maintains a comfortable temperature throughout. The electrical system was in a good condition. All switches in the electrical control panels have been labelled. The factory posted the evacuation plans at work floors, which indicates escape routes. Exit signs were installed. The facility has provided enough fire extinguishers in all working sections. A functional fire alarm system can be found in the facility. The facility's policy and procedures were communicated through the notice board in the local language. Drinking water was provided and installed in workshops. Sufficient and proper supplies/items were stocked in all of the first aid kits.

**Details:**

1. Fire-fighting equipment inspection and maintenance records
2. PPE training
3. Workplace occupational hazards factor testing report
4. License for special operation
5. Registration of special equipment
6. Inspection certificate of special equipment
7. Certificate of special equipment operator
8. Fire drill records
9. First aider certificates
10. Drinking water testing report
11. Interviews with EHS manager

# Findings: non-compliances

ZAF600699423

Non-compliance

Due 2025-01-14

## Code area

3 Working conditions are safe and hygienic

## 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.

## Issue title

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

## Description

It was noted that the gap between stacks and walls was 0.1 meter in packing material storage area and material warehouse, which was less than the legal requirement of 0.5 meter.  
在此次审核过程中，审核员发现工厂包材存放区域与原料仓库内垛与墙的间距为0.1米，小于法定0.5米的要求

## Corrective and preventative actions

It is recommended that the factory should provide proper fire safety training to workers, conduct regular health & safety inspection, adopt practices and controls to ensure that the width of gap between stacks and walls is in accordance with the legal requirement.

## Local law reference

In accordance with Article 18 of Rules for Warehouse Fire Prevention Safety Management: The goods in warehouse should be classified for storage. The area occupied by any single stack should 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.

## Evidence



[NC-Goods against wall.jpg](#) 

\* PDF generated at 06:06 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

### 3. Working conditions are safe and hygienic

## Data points

<b>Is someone within the company responsible for health and safety?</b>	Yes, senior manager or business owner
<b>Do workers operate high risk or heavy machinery or vehicles as part of their jobs?</b>	No
<b>Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?</b>	No
<b>Who organises accommodation for workers?</b>	Not applicable
<b>Who organises worker transportation between accommodation and worksite?</b>	Not applicable
<b>Who organises worker transportation while at work?</b>	Not applicable
<b>Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?</b>	<p>Yes</p> <p>The factory has obtained valid structural permit and inspection report for their buildings as per local law.</p>
<b>Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?</b>	No
<b>Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?</b>	No
<b>Does the site have a structural engineer evaluation?</b>	Yes

## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Auditor found that the facility had established anti-child labour management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The factory would verify all workers' original ID cards at the time of recruitment and keep the photocopies of ID cards in the personnel files. All employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth. Hiring procedure and related protection policy of young workers were also kept in place. No child labor or juvenile workers was working at the factory currently.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1. Personal file</li> <li>2. Roster of employees</li> <li>3. Management and employee interview</li> </ul>		

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger 7%

Enter the legal age of employment 16

Enter the age of the youngest worker identified 23

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%

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

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Auditor found that the facility had established wages and benefits management procedures onsite, however, it was not implemented properly because insufficient social insurance participation finding was noted.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600699421</a>

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

Written wage & benefits policy (involved relevant local law regarding Minimum Wages, Overtime wage and social insurance policy, paid annual leave, sick leave etc.) in place stated in the social compliance management manual which had clearly been communicated to all workers via labor contracts, factory rules (covered disciplinary measures policy / deductions from wages) posting and training etc.

During this audit, the factory provided 12 months' payrolls (from Nov 2023 to Oct 2024) for review. A sampling of these provided records for the months of Oct 2024 (most recent month), Jul 2024 (random month) and Apr 2024 (random month) were reviewed. As per factory management and provided payrolls, wages for all workers were calculated on hourly-rated basis and paid in cash around 7th of each month. Based on provided payrolls and time attendance records, both workers' basic wages and overtime wages met legal requirements, the hourly wage was paid of RMB 13.56-RMB18.39, which was above to the local legal minimum wage standard of RMB 2360 per month as equivalent to RMB 13.56 per hour since December 1, 2021. Overtime wage was paid at 150%, 200% and 300% of normal rate for overtime hours on normal working days, rest days and public holidays respectively, and total paid wages ranged from RMB 3628 to RMB 6225 per month. The gap between reported wages and legal requirements was nil and the percentage of workers being paid below the minimum wage was nil. For social insurance, a total of 42 employees (3 rehired employee) were eligible to receive five types of social insurances in Oct 2024 according to the law. However, through review of social insurance enrollment list, only 37 employees were enrolled in pension insurance, and 30 employees were enrolled in unemployment insurance, medical insurance, occupational injury insurance and child-bearing insurance.

Remark: The factory has provided the commercial incident injury insurance to its all employees, valid from Apr 13, 2024 to Apr 12, 2025.

A wage slip detailing: basic wages, hourly wage rate, normal working hours, overtime working hours, holiday working hours, normal working hours wage, overtime working hours wage, statutory holidays allowance, total monthly wages was provided to each worker.

**Details:**

- 1.Employee handbook
- 2.Wages and benefits policy
- 3.Annual leave records
- 4.Resigned workers payroll records
- 5.Payroll and attendance records
- 6.Social insurance and payment receipts

# Findings: non-compliances

ZAF600699421

Non-compliance

Due 2025-01-14

## 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 a total of 42 employees (3 rehired employees) were eligible to receive five types of social insurances in Oct 2024 according to the law. However, through review of social insurance enrollment list, only 37 employees were enrolled in pension insurance, and 30 employees were enrolled in unemployment insurance, medical insurance, occupational injury insurance and child-bearing insurance.

Remark: The factory has provided the commercial incident injury insurance to its all employees, valid from Apr 13, 2024 to Apr 12, 2025.

在此次审核过程中，审核员发现在42 (3退休返聘)名符合参保条件的员工中，只有37名参加了养老保险，只有30名参加了工伤保险,失业保险，医疗保险和生育保险。备注：工厂为所有员工人员购买了商业团体意外伤害保险，有效期从2024年4月13日至2025年4月12日。

## Area of non-compliance/non-conformance

Local law

Base code

## Corrective and preventative actions

It is recommended that the factory should ensure all eligible employees are entitled with all five types of social insurance schemes and therefore receive all their statutory welfare to comply with the Law. Under situations, some employees might be reluctant to be enrolled and contribute to such social insurance schemes, the factory should host training sessions to help them understand the importance of contributing toward social insurance schemes.

## Local law reference

In accordance with Social Insurance Act of the People's Republic of China, article 2, the state establishes basic pension insurance, basic medical insurance, occupational injury insurance, unemployment insurance, maternity insurance to form the social security system, to protect citizens' right to receive material assistance from the state and society in accordance with the law from old age, illness, work injury, unemployment, childbirth, etc.

Article 4. Employers and employees within the territory of the People's Republic of China should pay social insurance premiums in accordance with the law.

## Evidence



NC-Insufficient social insurance.JPG



\* PDF generated at 06:06 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

## 5. Legal wages are paid

### Data points

<b>What is the basic wage paid to workers?</b>	Wages are based on job skills and experience
<b>Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?</b>	Does not use digital payments (give details)  The factory paid the wages in cash.
<b>How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?</b>	None

### Worker renumeration

<b>Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?</b>	Not applicable
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### Summary information

<b>Is legal wage/legally recognised CBAs data available for any of these options?</b>	Monthly	
<b>Is actual wage data available on site for any of these options?</b>	Monthly	
<b>Maximum legal working hours</b>	<b>Max hours per day</b> <b>Max hours per week</b> <b>Max hours per month</b>	8.0 40.0 Non applicable
<b>Actual required working hours</b>	<b>Required hours per day</b> <b>Required hours per week</b> <b>Required hours per month</b>	8.0 40.0 Non applicable
<b>Maximum legal overtime hours</b>	<b>Max hours per day</b> <b>Max hours per week</b> <b>Max hours per month</b>	3.0 Non applicable 36.0

Actual overtime hours	Max hours per day	2.0
	Max hours per week	20.0
	Max hours per month	86.0
Minimum legal wage	Min per hour	13.56
	Min per day	108.51
	Min per week	Non applicable
	Min per month	2360.0
Actual minimum wage	Actual per hour	12.56
	Actual per day	108.51
	Actual per week	Non applicable
	Actual per month	2360.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	Non applicable
	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 Oct 2024 (most current month) 10 samples from Jul 2024 (random month) 10 samples from Apr 2024 (random month)
Are there different legal minimum/ legally recognised CBAs wage grades?	No

**For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?**

Above legal minimum

**Indicate the breakdown of workforce per earnings**

Based on the payroll records and attendance records provided by the factory, workers' minimum wages were paid above the local legal requirement, which was RMB 2,360 per month as equivalent to RMB 13.56 per hour since January 1, 2022.

**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	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Wages and benefits paid for a standard working week meet, at a minimum, national legal standards; no industry benchmark standards and living wage requirement in local. Then no need to review workers' total pay including benefits and compare it with a credible 'living wage' to calculate a 'living wage gap', and understand what proportion of the workforce has a gap.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.Payroll records</li> <li>2.Attendance records</li> <li>3.Local legal minimum wage documents</li> <li>4.Wages and benefits policy</li> <li>5.Labor contracts for all employees</li> <li>6.Pay slips of all interviewed workers</li> <li>7.Workers and management interview</li> </ul>		

## 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	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	Auditor found that the facility had established working hours management procedure onsite, however, it was not implemented properly because excessive monthly overtime finding was noted.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC <a href="#">ZAF600699422</a>

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

There's a written policy concerning working hours and overtime hours, as well as a system for monitoring working hours and overtime hours. The factory keeps a finger scan attendance system to ensure the attendance system to be accurate. Policy and Procedures for special terms for young workers and pregnant women are also in place.

During this audit, the factory provided 13 months' time attendance records (from Oct 2023 to Nov 2024) for review. A sampling of these provided records for the months of Oct 2024 (most recent month), Jul 2024 (random month) and Apr 024 (random month) were reviewed. Based on provided time attendance records, workers' working hours were 8-10 hours a day, 40-60 hours a week, with the average being 58 hours per week. The most continuous working days without rest were 6 while the average continuous working days without rest were 6.

Details:  
Employee handbook  
Wages and benefits policy  
Annual leave records  
Resigned workers time records  
Payroll and attendance records  
Production records

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# Findings: non-compliances

ZAF600699422

Non-compliance

Due 2025-01-14

## 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 the monthly overtime hours of 10 out of 10 (mainly from all production sections) exceeded 36 hours in Oct 2024 (most recent month) with the highest of 80 hours; 10 out of 10 (mainly from all production sections) exceeded 36 hours in Jul 2024 (random month) with the highest of 86 hours; 10 out of 10 (mainly from all production sections) exceeded 36 hours in Apr 2024 (random month) with the highest of 82 hours. Remark: No worker had worked more than 3 overtime hours per day, with the highest of 2 hours.

在此次审核中，审核员发现在随机抽取的10名工人中，有10名工人的月加班时间在2024年10月超过36小时，最高达到80小时；在2024年7月，随机抽取的10名工人中有10名工人月加班时间超过36小时，最高达到86小时；在2024年4月，随机抽取的10名工人中有10名工人月加班时间超过36小时，最高达到82小时。

## Area of non-compliance/non-conformance

Local law

Base code

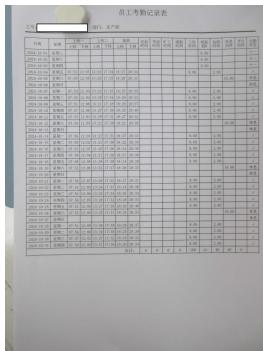
## Corrective and preventative actions

It is recommended that the factory should arrange reasonable production plan, increase productivity using positive means (such as bonuses) and reduce the overtime hours to ensure it is within 3 hours per day and 36 hours per month. Employees should be educated on health/safety dangers of excessive overtime.

## Local law reference

In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

## Evidence



[NC-Monthly OT.png](#)



\* PDF generated at 06:06 on 15 Nov 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

## 6. Working hours are not excessive

### Data points

<b>Is the sample size the same as in the wages section?</b>	Yes
<b>Normal day overtime premium as a percentage of standard wages</b>	150%
<b>If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?</b>	150%, 200%, 300% of normal rate for overtime hours on normal days, weekends and holidays respectively
<b>Excluding overtime, what are the regular working hours per week for workers at this site?</b>	40.0
<b>Including overtime, what is the average number of working hours per week for full-time workers at this site?</b>	58.0
<b>In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?</b>	60.0
<b>Maximum number of days worked without a day off in sample</b>	6

## 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
Explanation for management systems grades	Auditor found that the facility had established Anti-discrimination management procedure and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The factory has written policy on anti-discrimination as well as policy on compensation, promotion, and training etc.</p> <p>New staff hiring policy and advertise indicates that no pregnancy or health check (HIV testing, HB check) was required.</p> <p>Gender and ethnic balance between workers and middle management is proper.</p> <p>There's grievance channel (suggestion box or anonymous phone line etc.) for workers to report any discrimination.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.Factory policy, hiring procedure.</li> <li>2.Employee handbook.</li> <li>3.Payrolls, training records.</li> <li>4.Contracts, termination records.</li> </ul>		

## 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)?	90%
Representation of women in managerial roles (ratio of women workers to women managers)	11%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	5%
Three most common nationalities in managerial and supervisory roles	All managements and supervisors were from Chinese.

## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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	Auditor found that the facility had established employment management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>Work performed was on the basis of recognized employment relationship established through national law and normal practice. The factory never used any home-workers or agency workers. No apprentice or temporary worker was working in the factory. The factory signs labor contracts with employees within 30 days since employment, and all workers can have their own a copy of the contract and pay slip. HR staff was aware of local law concerning above worker pattern.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.Factory policy, employee handbook</li> <li>2.Labor contracts</li> <li>3.Hiring and termination records</li> <li>4.Personal files</li> <li>5.Management and worker's interview</li> </ul>		

## 8. Regular employment is provided

### Data points

Percentage of workers that are permanently or temporarily employed 100.0%

Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment 100.0%

Percentage of workers employed as apprentices, trainees or interns 0.0%

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

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	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	Auditor found that the facility had established subcontracting management and anti-using home workers procedures and they were implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The factory has customer policy on sub-contracting, homeworking, and external processing, as well as written policy and procedure in place to control external working.</p> <p>The factory posted customers' Code of Conduct in the facility. Through site tour, documents review and management &amp; workers interview, no external working was being used currently.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.Factory policy,</li> <li>2.Quality records and management &amp; workers interview</li> <li>3.Site tour (check production process)</li> </ul>		

## 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
<b>Number of workers</b>	-	-	-	-

**What processes are carried out by homeworker?**

**Are full records of homeworkers available at the site?**

**Does the supplier buy products or services from suppliers that use homeworkers?**

Information not available  
The factory didn't allow their suppliers to use homeworker as per the policy and no homeworker was noted as per the suppliers' assessment reports.

### Sub-contracting

**Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?**

No  
There was no such concern as per onsite tour, document review and interview.

**Are any sub-contractors used?**

No

## 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	Auditor found that the facility had established Anti-harsh and inhumane treatment management procedures, and they were implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The factory has established an anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited in this facility.</p> <p>The disciplinary procedure only includes oral warning, written warning and education, which was confirmed through worker's interview.</p> <p>The factory has established grievance mechanism with non-retaliation policy and allow workers to report issues anonymously. Related training records and grievance records / documented evidence were maintained in place.</p> <p>Security practices were humane and comply with customers' expectation.</p> <p>Details:</p> <ol style="list-style-type: none"> <li>1.Policy of prevention of harassment and abuse.</li> <li>2.Internal grievance procedure documentation.</li> <li>3.Training records</li> <li>4.Employee interview</li> </ol>		



## 9. No harsh or inhumane treatment is allowed

### Data points

<b>Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?</b>	Yes, there is a formal grievance process The grievance process is available to all workers The grievance process is available to members of the local community
<b>What type of grievance mechanism(s) are available?</b>	Suggestion box had been installed in the workshop and workers could also choose to report any concern to manager if needed.
<b>Number of grievances raised in the last 12 months</b>	0
<b>Number of grievances resolved in the last 12 months</b>	0

## 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	Auditor found that the facility had established environmental management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

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

**Current systems:**

The site has established Environmental policy concerning environment issue (including hazardous waste disposal handling procedures), and the responsible management staff was aware of local laws / regulations governing environment, keeps the law up to date.

The factory has got the environmental impact assessment documents examined and approved by authorized environmental protection department. No pollution observed in the factory.

The factory conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks.

The factory also established emergency reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and so on.

**Details:**

- 1.Environmental policy
- 2.Pollutant Discharge Registration
- 3.Risk assessment records
- 4.Emergency reduction target
- 5.Environmental impact report
- 6.Environmental project completion acceptance report
- 7.Hazardous waste disposal records
- 8.Workers and Factory management interview
- 9.Factory tour

## 10.A. Environment 2-Pillar

### Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	Nil
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC))?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	<p>Yes</p> <p>The factory has established reduction targets for water consumption and discharge, waste, energy and green-house gas emissions.</p>

## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	<p>The site has written policy in place concerning environment issue (including hazardous waste disposal handling procedures), and the responsible management staffs are aware of local laws / regulations governing environment, keeps the law up to date. The factory had obtained the environmental impact assessment documents examined and approved by authorized environmental protection department. The annual monitoring reports for air emission, wastewater and boundary noise were provided for review, and the results are within the restriction per environmental law. Based on observation on site, wastes were classified and collected on site. Based on worker's interview, they were trained on environmental protection.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.Environmental policy</li> <li>2.Risk assessment records</li> <li>3.Emergency reduction target</li> <li>4.Management and worker interview</li> <li>5.Environmental impact report</li> <li>6.Environmental project completion acceptance report</li> <li>7.Pollutant discharge permit</li> <li>8.Hazardous waste disposal records</li> <li>9.Factory tour</li> </ul>		

## 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?	Circular economy and resource efficiency Responsible use and management of water Sustainable material sourcing
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes  Factory had environment policy for managing client's requirements and legislation.
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any subcontracting 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  Factory had checked the suppliers' relevant environmental licenses and their environmental policy before conducting business.

### Usage/discharge analysis

	Last full calendar year (2023)	Previous full calendar year (2022)
Total electricity consumption from non-renewable sources (kWh)	6,746	3,612
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Other (provide details)  N/A	Other (provide details)  N/A

Total natural gas consumption (kWh)	0	0
Usage of other purchased fuels	0	0
Has the site completed any carbon footprint analysis?	No	No
Water sources	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	1,692	853
Water discharged	Municipal sewage system	Municipal sewage system
Water volume discharged (m3)	1,353.6	682.4
Water volume recycled (m3)	0	0
Total waste produced (mt)	11.8	7.5
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0	0
Waste to landfill (mt)	84	47.5
Waste to other (mt)	0	0
Total product produced (mt)	550,000	200,000

## 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	Auditor found that the facility had established Business Ethics management procedure, and it was implemented properly.

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>The company manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.</p> <p>The company established a business ethics policy which was communicated to workers through posters and training.</p> <p>The site had received and read the Business Ethics policy of the auditor/audit company. There was an internal grievance process, which was an anonymous email address.</p> <p>Details:</p> <ul style="list-style-type: none"> <li>1.The company business ethics policy including</li> <li>2.Bribery</li> <li>3.Corruption Training records Worker handbook</li> <li>4.Reports from Anonymous email account</li> <li>5.Worker and management interview</li> </ul>		

## 10.C. Business ethics

### Data points

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

No

Provide any certified anti-bribery management systems for the site

Nil

## Attachments



[LRQA-CN-SMTA-  
293083\\_Photo Form  
Shenzhen Jiewill Electronics  
Co., Ltd\\_November 12,  
2024.pdf](#)

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