SMETA

Sedex Members Ethical Trade Audit Report

Version 6.1

Audit Details			
Sedex Company Reference: *(only available on Sedex System)*	ZC: 180504748	Sedex Site Reference: *(only available on Sedex System)*	ZS: 202480107
Business name (Company name):	Dongguan City Shuoke Plastic & Metal Production Co., Ltd		
Site name:	Dongguan City Shuoke Plastic & Metal Production Co., Ltd 东莞市硕科塑胶五金制品有限公司		
Site address: *(Please include full address)*	Actual address: No.15, Road 4, Jingshan No. 3 Industrial Zone,Chashan Town, Dongguan, Guangdong, China Business license address: The same as above 广东省东莞市茶山镇京山第三工业区四路 15 号 营业执照地址：与上述地址一致	Country:	China
Site contact and job title:	Larry Yang / Manager		
Site phone:	13416987565	Site e–mail:	larry.yang@shokesports.com
SMETA Audit Pillars:	☒ Labour Standards	☒ Health & Safety (plus Environment 2-Pillar)	☒ Environment 4-pillar ☒ Business Ethics
Date of Audit:	Nov 3, 2022 Dec 28,2022		

Audit Company Name & Logo:	**Report Owner (payer):**
SGS-CSTC Standards Technical Services Co., Ltd.	Dongguan City Shuoke Plastic & Metal Production Co., Ltd

Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐

Multi–stakeholder	☐	Combined Audit (select all that apply)

If you have any concerns or queries about this SMETA report or the associated SMETA audit, please contact grievance@sedex.com.

To confirm the validity of this report, please visit https://www.sedex.com/audit-verifier/

Audit Content:

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 was applied. 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.

(2) The audit scope was against the following reference documents

2-Pillar SMETA Audit

- ETI Base Code
- SMETA Additions
  - Universal rights covering UNGP
  - Management systems and code implementation,
  - Responsible Recruitment
  - Entitlement to Work & Immigration,
  - Sub-Contracting and Home working,

4-Pillar SMETA

- 2-Pillar requirements plus
- Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Ethics
- The Customer's Supplier Code (Appendix 1)

(3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

(1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.

(2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Any exceptions to this must be recorded here (e.g. different sample size): Nil

Auditor Team (s) (please list all including all interviewers):
Lead auditor: Penny Peng APSCA number: CSCA21702031
Lead auditor APSCA status: CSCA
Team auditor: True Wong APSCA number: CSCA21702066
Interviewers: Penny Peng; True Wong
APSCA number: CSCA21702031; CSCA21702066

Report writer: Penny Peng
Report reviewer: Renee Qiu Yoga Wang

Date of declaration: Nov 3, 2022
Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

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.

Summary of Findings

Issue *(please click on the issue title to go direct to the appropriate audit results by clause)* ***Note to auditor, please ensure that when issuing the audit report, hyperlinks are retained.***		**Area of Non–Conformity** *(Only check box when there is a non–conformity, and only in the box/es where the non–conformity can be found)*				**Record the number of issues by line*:**			**Findings** ***(note to auditor, summarise in as few words as possible NCs, Obs and GE)***
		ETI Base Code	**Local Law**	**Additional Elements**	**Customer Code**	**NC**	**Obs**	**GE**	
0A	Universal Rights covering UNGP			☐	☐		0	0	Nil
0B	Management systems and code implementation		☐	☐	☐	0	0	0	Nil
1.	Freely chosen Employment	☐	☐		☐	0	0	0	Nil
2	Freedom of Association	☐	☐		☐	0	0	0	Nil
3	Safety and Hygienic Conditions	☒	☒		☐	3/0	0	1	Summary of Non-Compliance finding: 1. The factory did not provide pre-job occupational health examinations to workers. Closed 2. The factory did not provide occupational health examination summary report for review. Closed 3. About 80% gluing workers wore one-off surgical mask instead of activated carbon mask (although provided). Closed Summary of Observation finding: Nil Summary of GE:

									1. The factory provided free work meals for workers.
4	Child Labour	☐	☐		☐	0	0	0	Nil
5	Living Wages and Benefits	☐	☐		☐	0	0	0	Nil
6	Working Hours	☒	☒		☐	1	0	0	Summary of Non-Compliance finding: 1. Workers' overtime exceeded legal requirement. Summary of Observation finding: Nil Summary of GE: Nil
7	Discrimination	☐	☐		☐	0	0	0	Nil
8	Regular Employment	☐	☐	☐	☐	0	0	0	Nil
8A	Sub–Contracting and Homeworking		☐	☐	☐	0	0	0	Nil
9	Harsh or Inhumane Treatment	☐	☐	☐	☐	0	0	0	Nil
10A	Entitlement to Work		☐	☐	☐	0	0	0	Nil
10B2	Environment 2-Pillar		☐	☐	☐	NA	NA	NA	NA
10B4	Environment 4–Pillar		☐	☐	☐	0	0	0	Nil
10C	Business Ethics		☐	☐	☐	0	0	0	Nil
General observations and summary of the site:									

- The product manufactured in the factory was footballs.
- Overall responsibility for meeting the standards is taken by Mr. Yang Xiaoqiang/Factory Manager.
- A total of 103 employees in the factory during the audit, including 6 management staffs and 97 workers.
- The youngest worker in the factory was 19 years old, and who was born on 22 Oct. 2003 and entered the factory on 15 Apr. 2022.
- The peak season was not obvious according to management interview and production records.
- 10 workers were selected for interview, and they were interviewed as 1 group with 4 workers and 6 workers were interviewed individually.
- Standard working time was 5 days per week and 8 hours per day and all workers were paid by hourly rate.
- The local legal minimum wage was RMB1720 per month from Jul 2018 to Nov 2021 and RMB1900 per month since Dec 2021. The factory paid at least RMB1720 per month from Oct 2021 to Nov 2021 and RMB1900 per month from Dec 2021 to Sep 2022.
- The factory paid 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime, which was in line with legal requirement.
- All sampled workers' monthly overtime hours exceeded 36 hours, and the maximum monthly overtime hours reached to 66 hours.
- All sampled workers' weekly working hours didn't exceed 60 hours.
- All sampled workers enjoyed one day off per seven days, and the maximum continuous working days were 6 days.
- The factory provided social insurances for all workers.
- Production buildings were in good condition based on onsite observation.
- No child labour and young worker were identified during the audit.
- No forced labour was identified during the audit.
- No trade union was established in the factory. 2 worker representatives were available in the factory.
- The factory had established procedures on environment protection. Mr. Yang Xiaoqiang/Factory Manager was appointed to response the compliance of environment requirement.

**Please note the table above records the total number of Non-compliances (NC), Observations (Obs) and Good Examples (GE). This gives the reviewer an indication of problem areas but does not detail severities of each issue – Reviewers need to check audit results by clause.*

Site Details

<table>
<tr><th colspan="3">Site Details</th></tr>
<tr><td>A: Company Name:</td><td colspan="2">Dongguan City Shuoke Plastic & Metal Production Co., Ltd</td></tr>
<tr><td>B: Site name:</td><td colspan="2">Dongguan City Shuoke Plastic & Metal Production Co., Ltd
东莞市硕科塑胶五金制品有限公司</td></tr>
<tr><td>C: GPS location:
(If available)</td><td>GPS Address: No.15, Road 4, Jingshan No. 3 Industrial Zone,Chashan Town, Dongguan, Guangdong, China</td><td>Latitude: 23°5'19''N
Longitude: 113°49'59''E</td></tr>
<tr><td>D: Applicable business and other legally required licence numbers and documents, for example, business license number, liability insurance, any other required government inspections</td><td colspan="2">Business License No.: 914419005863910603
Valid date: Dec 8, 2011 to long term</td></tr>
<tr><td>E: Products/Activities at site, for example, garment manufacture, electricals, toys, grower, cutting, sewing, packing etc</td><td colspan="2">Footballs</td></tr>
<tr><td>F: Site description:
(Include size, location, and age of site. Also, include structure and number of buildings)</td><td colspan="2">Dongguan City Shuoke Plastic & Metal Production Co., Ltd was located at No.15, Road 4, Jingshan No. 3 Industrial Zone,Chashan Town, Dongguan, Guangdong, China. And it was founded on Dec 8, 2011.
There were one 1-storey production building and one 2-storey canteen building in the factory. The total land area occupied was approx. 2600 sq. meters.
There were total of 103 employees in the factory during the audit, including 6 management staffs and 97 workers.
All workers worked for one shift, from 8:00 to 12:00, and 13:30 to 17:30. Besides, overtime from 18:00 to 20:00 on regular working day and overtime on Saturday would be arranged when necessary. Workers could work for overtime voluntarily.
<table>
<tr><td>Office Building no1</td><td>Description</td><td>Remark, if any</td></tr>
<tr><td>Floor 1</td><td>Production building, warehouse, office</td><td>Built in 2004</td></tr>
<tr><td>Is this a shared building?</td><td>No</td><td>Nil</td></tr>
</table>
<table>
<tr><td>Canteen Building no1</td><td>Description</td><td>Remark, if any</td></tr>
<tr><td>Floor 1</td><td>Toilet and office</td><td>Built in 2004</td></tr>
<tr><td>Floor 2</td><td>Canteen</td><td>Built in 2004</td></tr>
</table></td></tr>
</table>

	<table><tr><td>Is this a shared building?</td><td>No</td><td>Nil</td></tr></table> For below, please add any extra rows if appropriate. F1: Visible structural integrity issues (large cracks) observed? ☐ Yes ☒ No F2: Please give details: Based on onsite observation, no visible structural integrity issues such as crack was found. F3: Does the site have a structural engineer evaluation? ☒ Yes ☐ No F4: Please give details: The factory provided building structure safety reports for all buildings.
G: Site function:	☐ Agent ☒ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub–Contractor
H: Month(s) of peak season: (if applicable)	Not obvious
I: Process overview: *(Include products being produced, main operations, number of production lines, main equipment used)*	The main products manufactured in the factory was footballs. The main production processes: Materials, Cutting, Digital Printing, Top gluing, Top coating, Panel folding & Edge gluing, Ball assembly, Ball foaming, Ball shaping, Ball gluing, Inspecting &Packing, Finished goods. The main production equipment: 1 cutting machine, 1 digital printing machine, 1 auto panel folding & Edge gluing machine, etc.
J: What form of worker representation / union is there on site?	☐ Union (name) ☒ Worker Committee ☐ Other (specify) ☐ None
K: Is there any night production work at the site?	☐ Yes ☒ No

L: Are there any on site provided worker accommodation buildings e.g. dormitories	☐ Yes ☒ No L1: If yes, approx. % of workers in on site accommodation No dormitory was provided to workers in the factory.
M: Are there any off site provided worker accommodation buildings	☐ Yes ☒ No M1: If yes, approx. % of workers
N: Were all site-provided accommodation buildings included in this audit	☐ Yes ☐ No N1: If no, please give details NA. No dormitory was provided to workers by the factory.

Audit Parameters			
A: Time in and time out	Day 1 Time in: 9:15 Day 1 Time out: 16:00	Day 2 Time in: Nil Day 2 Time out: Nil	Day 3 Time in: Nil Day 3 Time out: Nil
B: Number of auditor days used:	1.5MD (2 auditors x 0.75 days) NA (Desktop Review)		
C: Audit type:	☐ Full Initial ☒ Periodic ☐ Full Follow–up ☒ Partial Follow–Up Desktop Review (by Laura Yang) ☐ Partial Other If other, please define:		
D: Was the audit announced?	☐ Announced ☒ Semi – announced: Window detail: 2 weeks, Nov 2-15, 2022 ☐ Unannounced		
E: Was the Sedex SAQ available for review?	☒ Yes ☐ No If No, why not		
F: Any conflicting information SAQ/Pre-Audit Info to Audit findings?	☐ Yes ☒ No If **Yes**, please capture detail in appropriate audit by clause		
G: Who signed and agreed CAPR *(Name and job title)*	Larry Yang / Manager		
H: Is further information available *(if yes, please contact audit company for details)*	☐ Yes ☒ No		
I: Previous audit date:	Aug 21, 2021 Nov 3, 2022		
J: Previous audit type:	Periodic Periodic		
K: Were any previous audits reviewed for this audit	☒☒ Yes ☐ No ☐ N/A		

Audit attendance	**Management**	**Worker Representatives**	
	Senior management	Worker Committee representatives	Union representatives
A: Present at the opening meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No
B: Present at the audit?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No

C: Present at the closing meeting?	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No
D: If Worker Representatives were not present please explain reasons why *(only complete if no worker reps present)*	NA		
E: If Union Representatives were not present please explain reasons why: *(only complete if no union reps present)*	There was no trade union in the factory.		

Worker Analysis

The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity.

Worker Analysis								
	Local			Migrant*				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	
Worker numbers – Male	5	0	0	40	0	0	0	45
Worker numbers – female	9	0	0	43	0	0	0	52
Total	14	0	0	83	0	0	0	97
Number of Workers interviewed – male	0	0	0	4	0	0	0	4
Number of Workers interviewed – female	0	0	0	6	0	0	0	6
Total – interviewed sample size	0	0	0	10	0	0	0	10

A: Nationality of Management	Chinese	
B: Please list the nationalities of all workers, with the three most common nationalities listed first. *Please add more nationalities as applicable to site. Add more rows if required.*	Nationalities: B1: Nationality 1: _ Chinese _____ B2: Nationality 2: _____ B3: Nationality 3: _____	Was the list completed during peak season? ☐ Yes ☒ No If no, please describe how this may vary during peak periods: The peak season was not obvious
C: Please provide more information for the three most common nationalities.	C: approx % total workforce: Nationality 1 ____100%_____ C1: approx % total workforce: Nationality 2 _____ C2: approx % total workforce: Nationality 3 _____	
D: Worker remuneration *(management information)*	D: _____% on piece rate D1: __100 ___% hourly paid workers D2: _____% salaried workers Payment cycle: D3: _____% daily paid D4: _____% weekly paid D5: __100____% monthly paid D6: _____% other D7: If other, please give details	

Worker Interview Summary		
A: Were workers aware of the audit?	☒ Yes ☐ No	
B: Were workers aware of the code?	☒ Yes ☐ No	
C: Number of group interviews: *(Please specify number and size of groups. Please see SMETA Best Practice Guidance and Measurement Criteria. If the auditor was not able to follow the BPG, please state within the declaration)*	4 workers in 1 group	
D: Number of individual interviews *(Please see SMETA Best Practice Guidance and Measurement Criteria)*	D1: Male: 4	D2: Female: 2
E: All groups of workers are included in the scope of this audit such as; Direct employees, Casual and agency workers, Workers employed by service providers such as security and catering staff as well as workers supplied by other contractors. *Note to auditor: please record details of migrant /agency/contractor workers in section 8 – Regular Employment, under Responsible Recruitment*	☒ Yes ☐ No If no, please give details	
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	☒ Yes ☐ No	
G: In general, what was the attitude of the workers towards their workplace?	☒ Favourable ☐ Non–favourable ☐ Indifferent	
H: What was the most common worker complaint?	No worker complained anything during the interview.	
I: What did the workers like the most about working at this site?	Most workers said that they were satisfied with working condition and the wages.	
J: Any additional comment(s) regarding interviews:	Nil	
K: Attitude of workers to hours worked:	Most workers enjoyed working at this factory, they felt they had sufficient work and had a good relationship with management.	
L. Is there any worker survey information available?		
☐ Yes ☒ No L1: If yes, please give details:		

M: Attitude of workers: *(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk*
10 workers were selected for interview, and they were interviewed as 1 group with 4 workers and 6 workers were interviewed individually. The workers were assured of confidentiality and they spoke freely of their views of the factory. All workers said they were satisfied with their employment at the factory. All workers said they were satisfied with their employment at the factory and that they were satisfied with the current wages. They felt free to leave this employer and understood the notice period required. They had good relationships with their supervisors and managers who treated them with respect. They were able to make suggestions to their supervisors and team leaders and they could voice out to the workers' representative when necessary. They felt able to complain directly to their supervisors.
N: Attitude of worker's committee/union reps: *(Include their attitude to management, workplace, and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk*
Based on workers' representative interview, it was noted that the factory management was very care about workers and pay more attention to deal with workers' suggestion or complaint. The worker representative showed that the management was kind and the workplace was comfortable. No negative information was identified.
O: Attitude of managers: *(Include attitude to audit, and audit process. Both positive and negative information should be included)*
The factory management had a system in place to check their current practices against their clients' requirements and the local law, and they had implemented a Health & Safety committee to take care of health and safety concerns. The factory agreed that the auditor accesses to all facilities, and all requested documents and records were provided in a timely manner. The factory agreed that the auditor took photos for relevant documents or records in the factory. The factory agreed that the auditor conducted confidential interviews with employees who were chosen freely without any influence by the factory.

Audit Results by Clause

0A: Universal Rights covering UNGP
(Click here to return to summary of findings)

0.A. Guidance for Observations
0.A.1 Businesses should have a policy, endorsed at the highest level, covering human rights impacts and issues, and ensure it is communicated to all appropriate parties, including its own suppliers.
0.A.2 Businesses should have a designated person responsible for implementing standards concerning Human rights
0.A.3 Businesses shall identify their stakeholders and salient issues.
0.A.4 Businesses shall measure their direct, indirect, and potential impacts on stakeholders (rights holders) human rights.
0.A.5 Where businesses have an adverse impact on human rights within any of their stakeholders, they shall address these issues and enable effective remediation.
0.A.6 Businesses shall have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter.

Note for auditors and readers. This is not a full Human Rights Assessment, but instead a check on the business's implementation of processes to meet their Universal rights covering UNGP responsibilities.

Current Systems and Evidence Examined
To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:
- The factory had a policy, endorsed at the highest level, covering human rights impacts and issues. And the factory ensured that it is communicated to all appropriate parties.
- Mr. Yang Xiaoqiang/Factory Manager was appointed as senior member of management to responsible for compliance with ETI code, and Mr. LI Jiajin/HR Supervisor was appointed to responsible for implementing standards concerning Human rights.
- The terms and conditions for employees are stated in the employee handbook and some workers are trained in the grievance procedure.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
- Management interview
- Worker interview
- Employee manual, training records etc.

Any other comments:
Nil

A: Policy statement that expresses commitment to respect human rights?	☒ Yes ☐ No A1: Please give details: The factory established the policy which stated that expresses commitment to respect human rights.
B: Does the business have a designated person responsible for implementing standards concerning Human Rights?	☒ Yes ☐ No Please give details: Name: Li Jiajin Job title: HR Supervisor
C: Does the business have a transparent system in place for confidentially reporting, and dealing with human rights impacts without fear of reprisals towards the reporter?	☒ Yes ☐ No C1: Please give details: Factory had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter, such as suggestion box.
D: Does the grievance mechanism meet UNGP expectations? (Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-compatible, a source of continuous learning and based on stakeholder engagement)	☒ Yes ☐ No D1: If no, please give details
E: Does the business demonstrate effective data privacy procedures for workers' information, which is implemented?	☒ Yes ☐ No E1: Please give details: The factory had established the related policy, which was communicated with workers effectively, and all workers' information was kept and locked in HR office.

Findings	
Finding: Observation ☐ **Company NC** ☐ **Description of observation:** Nil **Local law or ETI/Additional elements / customer specific requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good examples observed:

Description of Good Example (GE):	**Objective Evidence Observed:**
Nil	Nil

Measuring Workplace Impact

Workplace Impact		
A: Annual worker turnover: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	A1: Last year: _18.12____ %	A2: This year _18.11____ %
B: Current % quarterly (90 days) turnover: Number of workers leaving from the first day of the 90 days period through to the last day of the 90 day period / [(number of employees on the 1st day of 90 day period + number of employees on the last day of the 90 day period) / 2]	1.05%	
C: Annual % absenteeism: Number of days lost through job absence in the year / [(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	C1: Last year: _3____ %	C2: This year __3.1___ %
D: Quarterly (90 days) % absenteeism: Number of days lost through job absence in the period / [(Number of employees on 1st of the period + Number of employees on the last day of the period) / 2] * Number of available workdays in the month	1%	
E: Are accidents recorded?	☒ Yes ☐ No E1: Please describe: Based on accident records review, it was noted that work-related accidents were recorded, and analysed, corrective and preventive measures were taken in the factory.	
F: Annual Number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	F1: Last year: Number: 0	F2: This year: Number: 0
G: Quarterly (90 days) number of work related accidents and injuries per 100 workers: [(Number of work related accidents and injuries * 100) / Number of total workers]	0	
H: Lost day work cases per 100 workers: [(Number of lost days due to work accidents and work related injuries * 100) / Number of total workers]	H1: Last year: 0	H2: This year: 0
I: % of workers that work on average more than 48 standard hours / week in the last 6 / 12 months:	I1: 6 months ___0____% workers	I2: 12 months ____0____% workers

J: % of workers that work on average more than 60 total hours / week in the last 6 / 12 months:	J1: 6 months __0_____% workers	J2: 12 months ___0_____% workers

0B: Management system and Code Implementation *(Click here to return to summary of findings)*
0.B.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code. 0.B.2 Suppliers are expected to be operating legally in premises with the correct business licenses and permissions and to have systems to ensure that all relevant land rights have been complied with 0.B.3 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code. 0.B.4 Suppliers are expected to communicate this Code to all employees. 0.B.5 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current systems: • Mr. Yang Xiaoqiang/Factory Manager was appointed as senior member of management to responsible for compliance with ETI code. • The factory established social responsibility system and policy in the factory. • The factory conducted internal audit and management review on social responsibility regularly. • The factory monitored the compliance of social responsibility for its suppliers regularly. **Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Details: • Social responsibility policy and procedure • Management system • Worker and management interview • Document review Any other comments: Nil

Management Systems:	
A: In the last 12 months, has the site been subject to any fines/prosecutions for non–compliance to any regulations?	☐ Yes ☒ No A1: Please give details: No such fine or prosecutions were identified.
B: Do policies and/or procedures exist that reduce the risk of forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No

	B1: Please give details: Policies existed for Forced labour, Health and Safety, Living Wage, Working Hours, No harsh treatment, Environment etc. No negative evidence was found.
C: If Yes, is there evidence (an indication) of effective implementation? Please give details.	The factory had established the related policy and provided the training to all related workers to make sure the policy effectively, that was also confirmed via interview with workers and management staffs.
D: Have managers and workers received training in the standards for forced labour, child labour, discrimination, harassment & abuse?	☒ Yes ☐ No D1: Please give details: The factory had provided the training to management and workers.
E: If Yes, is there evidence (an indication) that training has been effective e.g. training records etc.? Please give details	☒ Yes ☐ No E1: Please give details: The factory had provided the training to management and workers. The related record was provided for review.
F: Does the site have any internationally recognised system certifications e.g. ISO 9000, 14000, OHSAS 18000, SA8000 (or other social audits). *Please detail (Number and date).*	☐ Yes ☒ No F1: Please give details: The factory did not obtain these certificates.
G: Is there a Human Resources manager/department? If Yes, please detail.	☒ Yes ☐ No G1: Please give details: There was a HR department in the factory.
H: Is there a senior person / manager responsible for implementation of the code	☒ Yes ☐ No H1: Please give details: Mr. Yang Xiaoqiang/Factory Manager was appointed as senior member of management to responsible for compliance with ETI code.
I: Is there a policy to ensure all worker information is confidential?	☒ Yes ☐ No I1: Please give details: There was a policy to ensure all worker information is confidential.
J: Is there an effective procedure to ensure confidential information is kept confidential?	☒ Yes ☐ No J1: Please give details: Effective procedure to ensure confidential information is kept confidential. Policy was established in employee manual.
K: Are risk assessments conducted to evaluate policy and procedure effectiveness?	☒ Yes ☐ No

	K1: Please give details: Risk assessment was conducted to evaluate policy and procedure effectiveness, such as internal audit and management review.
L: Does the facility have a process to address issues found when conducting risk assessments, including implementation of controls to reduce identified risks?	☒ Yes ☐ No L1Please give details: If issues found, actions should be taken confirmed with management and HR department manager.
M: Does the facility have a policy/code which require labour standards of its own suppliers?	☒ Yes ☐ No M1: Please give details: The factory had established labour standards of its suppliers and the factory communicated the standards with its suppliers and required supplier for policy or code implementation.
Land rights	
N: Does the site have all required land rights licenses and permissions *(see SMETA Measurement Criteria)*?	☒ Yes ☐ No N1: Please give details: The business license and lease contract were provided for review.
O: Does the site have systems in place to conduct legal due diligence to recognize and apply national laws and practices relating to land title?	☒ Yes ☐ No O1: Please give details: The business license and lease contract were provided for review.
P: Does the site have a written policy and procedures specific to land rights. If yes, does it include any due diligence the company will undertake to obtain free, prior and informed consent, (FPIC) even if national/local law does not require it	☒ Yes ☐ No P1: If yes, how does the company obtain FPIC: The factory had a written policy and procedures specific to land rights, and it included the company will undertake to obtain free, prior and informed consent.
Q: Is there evidence that facility / site compensated the owner/lessor for the land prior to the facility being built or expanded.	☐ Yes ☐ No Q1: Please give details: NA. The factory provided the business license and lease contract.
R. Does the facility demonstrate that alternatives to a specific land acquisition were considered to avoid or minimize adverse impacts?	☐ Yes ☐ No R1: Please give details: NA. The factory provided the business license and lease contract.
S: Is There any evidence of illegal appropriation of land for facility building or expansion of footprint.	☐ Yes ☒ No S1: Please give details: No negative evidence was identified.

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective evidence observed:** Nil

1: Freely Chosen Employment *(Click here to return to summary of findings)*
ETI 1.1 There is no forced, bonded or involuntary prison labour. 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

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

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
Factory rules
Employee handbook
Personnel files
Resignation records
Contracts
Management and worker interview

Any other comments:
Nil

A: Is there any evidence of retention of original documents, e.g. passports/ID's	☐ Yes ☒ No A1: If yes, please give details and category of workers affected:
B: Is there any evidence of a loan scheme in operation	☐ Yes ☒ No B1: If yes, please give details and category of worker affected:
C: Is there any evidence of retention of wages /deposits	☐ Yes ☒ No C1: If yes, please give details and category of worker affected:

D: Are there any restrictions on workers' freedom to terminate employment?	☐ Yes ☒ No D1: Please describe finding: Confirmed by worker interview and document review, no such evidence was found during the audit day.
E: If any part of the business is UK based or registered there & has a turnover over £36m, is there a published a 'modern day slavery statement?	☐ Yes ☐ No ☒ Not applicable E1: Please describe finding: NA
F: Is there evidence of any restrictions on workers' freedoms to leave the site at the end of the work day?	☐ Yes ☒ No F1: Please describe finding: Confirmed by worker interview and site observation, no such evidence was found during the audit day.
G: Does the site understand the risks of forced / trafficked / bonded labour in its supply chain	☒ Yes ☐ No ☐ Not applicable G1: If yes, please give details and category of workers affected: No forced/ trafficked / bonded labour was identified in its supply chain.
H: Is the site taking any steps taking to reduce the risk of forced / trafficked labour?	☒ Yes ☐ No H1: Please describe finding: The factory provided training for workers regularly to reduce the risk.

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law: ☐ NC against customer Nil **Local law and/or ETI requirement** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil	**Objective evidence observed:** Nil

Comments: Nil	

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective evidence observed:** Nil

2: Freedom of Association and Right to Collective Bargaining are Respected

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
2.3 Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

• The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.
• No trade union was established in the factory. 2 worker representatives were available in the factory and one worker representative attended the opening and closing meeting during this audit.
• The worker representatives' meeting was conducted quarterly.
• Through worker interview, the worker could raise their grievances or complaint through worker representatives or management directly.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
• The policy on freedom of association
• Interview with workers and management
• Interview with worker representative
• Election and meeting minutes

Any other comments:
Nil

A: What form of worker representation/union is there on site?	☐ Union (name) ☒ Worker Committee ☐ Other (specify) ☐ None

B: Is it a legal requirement to have a union?	☐ Yes ☒ No	
C: Is it a legal requirement to have a worker's committee?	☐ Yes ☒ No	
D: Is there any other form of effective worker/management communication channel? *(Other than union/worker committee e.g. H&S, sexual harassment)*	☒ Yes ☐ No D1: Please give details: The worker could raise up their opinion through suggestion box or communicate with their supervisor directly. D2: Is there evidence of free elections? ☒ Yes ☐ No	
E: Does the supplier provide adequate facilities to allow the Union or committee to conduct related business?	☒ Yes ☐ No E1: Please give details: The meeting room was provided by factory.	
F: Name of union and union representative, if applicable:	No union was founded in factory.	F1: Is there evidence of free elections? ☐ Yes ☐ No ☒ N/A
G: If there is no union, is there a parallel means of consultation with workers e.g. worker committees?	2 worker representatives were elected in the factory.	G1: Is there evidence of free elections? ☒ Yes ☐ No ☐ N/A
H: Are all workers aware of who their representatives are?	☒ Yes ☐ No	
I: Were worker representatives freely elected?	☒ Yes ☐ No	I1: Date of last election: Jan 12, 2022
J: Do workers know what topics can be raised with their representatives?	☒ Yes ☐ No	
K: Were worker representatives/union representatives interviewed?	☒ Yes ☐ No If **Yes**, please state how many: Auditor interviewed one worker representative during the audit.	
L: Please describe any evidence that union/worker's committee is effective? *Specify date of last meeting; topics covered; how minutes were communicated etc.*	The worker representatives' meeting was conducted unregularly. The last meeting was conducted on Sep 22, 2022. The meeting topics were about work welfare, working condition, health and safety etc. Related meeting records were provided for review.	
M: Are any workers covered by Collective Bargaining Agreement (CBA)?	☐ Yes ☒ No	

If **Yes**, what percentage by trade Union/worker representation	M1: __0__% workers covered by Union CBA	M2: _0___% workers covered by worker rep CBA
M3: If **Yes**, does the Collective Bargaining Agreement (CBA) include rates of pay?	☐ Yes ☐ No NA	

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI ☐ NC against Local Law ☐ NC against customer code: Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective evidence observed:** Nil

3: Working Conditions are Safe and Hygienic

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
3.2 Workers shall receive regular and recorded Health & Safety training, and such training shall be repeated for new or reassigned workers.
3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
3.5 The company observing the code shall assign responsibility for Health & Safety to a senior management representative.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

1. General Health and Safety management
•Mr. Yang Xiaoqiang/Factory Manager was responsible for issue of Health & Safety in the factory.
• Minutes of meetings show that there were regularly meetings between H&S committee and H&S manager.
• Ventilation, temperature and lighting were adequate for the production processes.
• Sufficient clean toilets segregated by gender were available at all time to workers.
• The factory provided potable water to workers free of charge in workshop.
2. Fire Safety
• Evacuation plans were posted in all workshops and understood by all interviewed workers.
• The adequate emergency exits for all workshops.
• Sufficient fire-fighting equipment such as fire extinguishers and hydrants in production building. Regular inspection was taken by the factory per month.
• Fire drill was conducted in the factory twice per year according to the fire drill plans and the records were provided for review.
3. Electrical safety
• All parts of electrical equipment were maintained in good condition such as sockets, plugs, switches and main fuse boards.
• There was one competent electrician in the factory and the certificate was available for review.
4. Chemical safety
• Chemical inventory list was available.
• Workers in the chemical store area confirmed that they had been trained on correct handling procedures as well as what to do in an emergency.
5. Medical services
• Sufficient first aid kits in each production area and they were well stocked.
• 2 first aiders were available in the factory and the certificates were provided for review.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Health and safety policy
- Health and safety manual
- Health and safety committee minutes
- Fire equipment maintenance records
- Training records and certificates
- Fire acceptance certificates or records
- The completion acceptance reports or records
- Chemical list and MSDS
- Fire drill records
- Trained first aider register
- Accident records
- Onsite observation
- Worker and management interview

Any other comments:
Nil

A: Does the facility have general and occupational Health & Safety policies and procedures that are fit for purpose and are these communicated to workers?	☒ Yes ☐ No A1: Please give details: Mr. Yang Xiaoqiang/Factory Manager was responsible for issue of Health & Safety in the factory.
B: Are the policies included in workers' manuals?	☒ Yes ☐ No B1: Please give details: The policy was written in worker's manual.
C: Are there any structural additions without required permits/inspections (e.g. floors added)?	☐ Yes ☒ No C1: Please give details: The factory provided the building construction record for review. And based on onsite observation, the building was in good condition.
D: Are visitors to the site informed on H&S and provided with personal protective equipment	☒ Yes ☐ No D1: Please give details: Visitors to the site would be informed on H&S and provided with appropriate PPEs.
E: Is a medical room or medical facility provided for workers? If yes, do the room(s) meet legal requirements and is the size/number of rooms suitable for the number of workers.	☐ Yes ☒ No E1: Please give details: NA. No legal requirement regarding this.
F: Is there a doctor or nurse on site or there is easy access to first aider/ trained medical aid?	☒ Yes ☐ No F1: Please give details: 2 first aiders were available in the factory.
G: Where the facility provides worker transport - is it fit for purpose, safe, maintained and operated by	☐ Yes ☐ No NA

competent persons e.g. buses and other vehicles?	G1: Please give details: The factory did not provide worker transport.
H: Is secure personal storage space provided for workers in their living space and is fit for purpose?	☐ Yes ☐ No NA H1: Please give details: No dormitory was provided to workers by the factory.
I: Are H&S Risk assessments are conducted (including evaluating the arrangements for workers doing overtime e.g. driving after a long shift) and are there controls to reduce identified risk?	☒ Yes ☐ No I1: Please give details: EHS risk assessments were conducted regularly with actions implementation.
J: Is the site meeting its legal obligations on environmental requirements including required permits for use and disposal of natural resources?	☒ Yes ☐ No J1: Please give details: The factory conducted environmental impact assessment.
K: Is the site meeting its customer requirements on environmental standards, including the use of banned chemicals?	☒ Yes ☐ No K1: Please give details: No banned chemicals were used in the factory.

Non–compliance:

1. Description of non–compliance:
☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code**:**
The factory did not provide pre-job occupational health examinations to workers.
Based on management interview and worker interview, it was found that the factory did not provide pre-job occupational health examinations to the workers who exposed to occupational hazardous factors. Such as the gluing workers who contacted with glue and entered in the factory during Nov 2021 to Oct 2022.
Desktop review on 28 Dec 2022: Closed
Photos provided showed the factory had provided pre-job occupational health examinations to the workers who exposed to occupational hazardous factors, relevant reports had been provided for review. In addition, the factory had formulated the management procedure of occupational health examination. The factory will provide pre-job, on-the-job, and off-the-job occupational medical examination for all workers who exposed to occupational disease hazards.

Local law and/or ETI requirement:
Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35
For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results. The expenses for the occupational medical examination shall be assumed by the employer. Employers shall not assign employees who have not undergone the pre-job occupational medical examination to operations with exposure to

Objective evidence observed:
Management interview
Worker interview

occupational hazards; shall not assign employees with occupational contraindications to operations causing such contraindications; shall transfer employees who are found during occupational medical examination to have suffered health injuries related to their jobs from such jobs and settle such employees appropriately; and shall not rescind or terminate labor contacts with employees who have not undergone the off-the-job occupational medical examination. The occupational medical examination shall be conducted by medical health institutions that has obtained the Medical Device Practice License…. ETI Base code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. **Recommended corrective action:** The factory should provide relevant occupational health examinations to workers as per legal requirement. Closed	
2. Description of non–compliance: ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code: The factory did not provide occupational health examination summary report for review. Desktop review on 28 Dec 2022: Closed Photos provided showed the factory had provided occupational health examination summary report, five worker involving noise occupational contraindication was adjusted to other non-hazardous position, it's accepted. **Local law and/or ETI requirement:** **Technical specifications for occupational health surveillance (GBZ 188-2014), Article** 4.8.1 Report types of occupational medical examination Occupational medical examination agency should sign occupational medical examination agreements with employer according to related regulation and provide occupational medical examination reports to employer. Occupational medical examination reports divide to summary reports, individual reports, and occupational health surveillance evaluation. Occupational medical examination reports and evaluation should comply with seriousness, scientific rigor and objective justice of law. 4.8.2 Occupational medical examination summary report Occupational medical examination summary report is a written report provided by examination agency to delegate unit (employer), is comprehensive summing-up of the examination, shall including inspected unit, Occupational medical examination type, number of people examined, examination place and time, implementation situation of examination, suspected occupational diseases, occupational contraindication, number of people of other diseases, summary list and treatment suggestion etc. Individual examination result shall be listed as data sheet.	**Objective evidence observed:** Management interview Document review

ETI Base code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. **Recommended corrective action:** The factory should obtain occupational health examination summary report as per legal requirement. Closed	
3. Description of non–compliance: ☒ NC against ETI ☒ NC against Local Law ☐ NC against customer code: About 80% gluing workers wore one-off surgical mask instead of activated carbon mask (although provided). Desktop review on 28 Dec 2022: Closed Photos provided showed the gluing workers were wearing activated carbon mask when working. **Local law and/or ETI requirement:** **Production Safety Law of the People's Republic of China (2021 Amendment), Article 45** A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules. ETI Base code 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. **Recommended corrective action:** The factory should ensure workers wear proper PPE during operation. Closed	**Objective evidence observed:** Management interview Document review Photos refer to NC photo No. 1 and 2

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:

Description of Good Example (GE): The factory provided free work meals for workers.	**Objective Evidence Observed:** Document review, management interview and worker interview Photo refers to GE No. 1

4: Child Labour Shall Not Be Used

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

4.1 There shall be no new recruitment of child labour.
4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child.
4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

• The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their original copies of ID card were kept in their personnel file. And the policy stated that the factory never employed and used any child labour under the age of 16 years old.
• The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, also did not arrange young workers to hazardous post.
• Checks of all workers files showed that no child labour or young worker was identified during the audit. The youngest worker in the factory was 19 years old, and who was born on 22 Oct. 2003 and entered the factory on 15 Apr. 2022

• Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
• Policy on workers recruitment
• Personnel files including the ID card copies of workers
• Roster and labour contracts of all workers
• Worker and management interview

Any other comments:
Nil

A: Legal age of employment:	16 years old
B: Age of youngest worker found:	19 years old

C: Are there children present on the work floor but not working at the time of audit?	☐ Yes ☒ No
D: % of under 18's at this site (of total workers)	0 %
E: Are workers under 18 subject to hazardous work assignments? (Go to clause 3 – Health and Safety)	☐ Yes ☒ No E1: If yes, give details

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

5: Living Wages are Paid

(Click here to return to summary of findings)
(Click here to return to Key information)

ETI

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:
• All workers' wages were calculated by hourly rate.
• Minimum wage guarantee system was established for all workers. Workers' minimum wages meet the local legal requirement.
• The factory paid 150% of normal wage rate for weekday overtime, 200% of normal wage rate for weekend overtime and 300% of normal wage rate for statutory holiday overtime, which was in line with legal requirement.
• The factory provided social insurances for all workers.
• All workers were paid before 10th of following month by cash, each worker was given a pay slip and signed for their wages.
• All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
• Payroll records
• Attendance records
• Local legal minimum wage documents
• Wages and benefits policy
• Labor contracts for all employees
• Leave records and resignation records
• Payment receipts of social insurance
• Workers and management interview

Any other comments: Nil

Non–compliance:

1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

Summary Information

Criteria	**Local Law** *(Please state legal requirement)*	**Actual at the Site** *(Record site results against the law)*	**Is this part of a Collective Bargaining Agreement?**
A: Standard/Contracted work hours: *(Maximum legal and actual required working hours excluding overtime, please state if possible per day, week, and month)*	Legal maximum: 8 hours per day, 40 hours per week	A1: 8 hours per day, 40 hours per Week.	A2: ☐ Yes ☒ No
B: Overtime hours: *(Maximum legal and actual overtime hours, please state if possible per day, week, and month)*	Legal maximum: 3 hours per day and 36 hours per month	B1: 2 hours per day, 16 hours per week, 62 hours/month in Sep. 2022 (Current Month) 2 hours per day, 16 hours per week, 62 hours/month in May. 2022 (Random Month)	B2: ☐ Yes ☒ No

		2 hours per day, 16 hours per week, 66 hours/month in Apr. 2022 (Random Month)	
C: Wage for standard/contracted hours: *(Minimum legal and actual minimum wage at site, please state if possible per hr, day, week, and month)*	Legal minimum: The local legal minimum wage was RMB1720 per month from Jul 2018 to Nov 2021 and RMB1900 per month since Dec 2021	C1: The factory paid at least RMB1720 per month from Oct 2021 to Nov 2021 and RMB1900 per month from Dec 2021 to Sep 2022.	C2: ☐ Yes ☒ No
D: Overtime wage: *(Minimum legal and actual minimum overtime wage at site, please state if possible per hr, day, week, and month)*	Legal minimum: 150% of normal wage for overtime on workdays; 200% of normal wage for overtime on rest days; 300% of normal wage for overtime on holidays.	D1: 150% of normal wage for overtime on workdays; 200% of normal wage for overtime on rest days; 300% of normal wage for overtime on holidays.	D2: ☐ Yes ☒ No

Wages analysis: *(Click here to return to Key Information)*		
A: Were accurate records shown at the first request?	☒ Yes ☐ No	
A1: If **No**, why not?	NA	
B: Sample Size Checked *(State number of worker records checked and from which weeks/months – should be current, peak, and random/low. Please see SMETA Best Practice Guidance and Measurement Criteria)*	10 samples from Sep. 2022 (Current Month), 10 samples from May. 2022 (Random Month), 10 samples from Apr. 2022 (Random Month).	
C: Are there different legal minimum wage grades? If **Yes**, please specify all.	☐ Yes ☒ No	C1: If **Yes**, please give details:

D: If there are different legal minimum grades, are all workers graded and paid correctly?	☐ Yes ☐ No ☒ N/A	D1: If **No**, please give details:	
E: For the lowest paid production workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum?	☐ Below legal min ☒ Meet ☐ Above	E1: Lowest actual wages found: *Note: full time employees and please state hour / week / month etc.* The local legal minimum wage was RMB1720 per month from Jul 2018 to Nov 2021 and RMB1900 per month since Dec 2021. The factory paid at least RMB1720 per month from Oct 2021 to Nov 2021 and RMB1900 per month from Dec 2021 to Sep 2022.	
F: Please indicate the breakdown of workforce per earnings:	F1: ____% of workforce earning under minimum wage F2: _100___% of workforce earning minimum wage F3: ____% of workforce earning above minimum wage		
G: Bonus Scheme found: Please specify details:	Bonus Scheme found: *Note: type of employee (e.g. full time, temp, etc.) and please state which units e.g. /hour /week /month etc.* Production bonus.		
H: What deductions are required by law e.g. social insurance? Please state all types:	Social insurance, personal income tax		
I: Have these deductions been made?	☒ Yes ☐ No	I1: Please list all deductions that **have** been made.	1. Tax 2. Social insurance Please describe: 1. The workers would be deducted the tax who reach the starting point of the personal income tax. 2. All workers purchased social insurances.
		I2: Please list all deductions that **have not** been made.	1. Tax Please describe: 1. The workers would not be deducted the tax who did not reach the starting point of the personal income tax.
J: Were appropriate records available to verify hours of work and wages?	☒ Yes ☐ No		

K: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☒ No	K1: Type ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence:
L: Do records reflect all time worked? (For instance, are workers asked to attend meetings before or after work but not paid for their time)	☒ Yes ☐ No L1: Please give details: The factory provided accurately attendance records from Oct 1, 2021 to audit date for review.	
M: Is there a defined living wage: *This is not normally minimum legal wage. If answered yes, please state amount and source of info: Please see SMETA Best Practice Guidance and Measurement Criteria.*	☐ Yes ☒ No M1: Please specify amount/time: NA	
M2: If yes, what was the calculation method used.	☐ISEAL/Anker Benchmarks ☐Asia Floor Wage ☐Figures provided by Unions ☐Living Wage Foundation UK ☐Fair Wear Wage Ladder ☐Fairtrade Foundation Other – please give details: NA	
N: Are there periodic reviews of wages? If Yes give details (include whether there is consideration to basic needs of workers plus discretionary income).	☒ Yes ☐ No N1: Please give details: The factory reviewed the wages yearly refer to local bureau opinion etc. and informed workers about salary adjustment.	
O: Are workers paid in a timely manner in line with local law?	☒ Yes ☐ No	
P: Is there evidence that equal rates are being paid for equal work:	☒ Yes ☐ No P1: Please give details: The wage policy was established in factory and workers knew the equal rates well.	
Q: How are workers paid:	☒ Cash ☐ Cheque ☐ Bank Transfer ☐ Other Q1: If other, please explain:	

6: Working Hours are not Excessive

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any 7-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

*6.5 Working hours may exceed 60 hours in any 7-day period only in exceptional circumstances where **all** of the following are met:*

– this is allowed by national law;
– this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
– appropriate safeguards are taken to protect the workers' health and safety; and
– The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, 2 days off in every 14-day period.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Through employees' interview, overtime is voluntary.
- According to attendance records and worker interview, basic working hours were 8 hours per day and 40 hours per week.
- Finger-print recognition attendance machine was used to record workers' attendance records.
- All sampled workers' monthly overtime hours exceeded 36 hours and the maximum monthly overtime hours reached to 66 hours.
- All sampled workers' weekly working hours didn't exceed 60 hours.
- All sampled workers enjoyed one day off per seven days and the maximum continuous working days were 6 days.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Worker and management interview
- Factory policy on working hours
- Attendance records and payroll records
- Workers' contracts
- Warehouse and production records to cross check hours

Any other comments:
Nil

Non–compliance:	
1. Description of non–compliance: ☒ NC against ETI code**:** ☒ NC against Local Law ☐ NC against customer Workers' overtimes exceeded legal requirement. The factory provided attendance records from 1 Oct. 2021 to the audit date. Auditors randomly selected 10 workers (including warehouse keeper, production workers and inspectors) as samples in Sep.2022 (current month), May 2022 (random month), and Apr. 2022 (random month). And found: 1) In Sep. 2022, the monthly overtime hours of all sampled workers exceeded 36 hours, and reached maximum 62 hours; 2) In May. 2022, the monthly overtime hours of all sampled workers exceed 36 hours, and reached maximum 62 hours; 3) In Apr. 2022, the monthly overtime hours of all sampled workers exceeded 36 hours and reached maximum 66 hours. **Local law and/or ETI requirement:** **Labor Law of the People's Republic of China (2018 Amendment), Article 41** The employing unit 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. ETI base code 6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub–clauses 6.2 to 6.6 are based on international labour standards. **Recommended corrective action:** The factory should ensure workers' overtimes in line with legal requirement.	**Objective evidence observed:** Document review and worker interview NC photo -03

Observation:

Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective evidence observed:** Nil

Working hours' analysis *Please include time e.g. hour/week/month* *(Go back to Key information)*		
Systems & Processes		
A. What timekeeping systems are used: time card etc.	*Describe:* Finger-print recognition attendance machine	
B: Is sample size same as in wages section?	☒ Yes ☐ No B1: If no, please give details	
C: Are standard/contracted working hours defined in **all** contracts/employment agreements?	☒ Yes ☐ No	*C1: If NO, please give details including % and which type of workers do NOT have standard hours defined in contracts/employment agreements.* Please give details:
D: Are there any other types of contracts/employment agreements used?	☐ Yes ☒ No	*D1: If YES, please complete as appropriate:* ☐ 0 hrs ☐ Part time ☐ Variable hrs ☐ Other If "Other", Please define: *NA*
E. Do any standard/contracted working hours defined in contracts/employment	☐ Yes ☒ No	*E1: If **yes**, please detail hours, %, types of workers affected and frequency* Please give details: NA

agreements exceed 48 hours per week?		
F: Are workers provided with at least 1 day off in every 7-day-period, or 2 in 14-day-period?	F2: Please select all applicable: ☒ 1 in 7 days ☐ 2 in 14 days ☐ No If 'No', please explain:	F3: Is this allowed by local law? ☒ Yes ☐ No
	Maximum number of days worked without a day off (in sample):	
	The maximum consecutive working days were 6 days.	
Standard/Contracted Hours worked		
G: Were standard working hours over 48 hours per week found?	☐ Yes ☒ No	G1: If yes, % of workers & frequency:
		NA
H: Any local waivers/local law or permissions which allow averaging/annualised hours for this site?	☐ Yes ☒ No	H1: If yes, please give details:
		NA
Overtime Hours worked		
I: Actual overtime hours worked in sample (State per day/week/month)	Highest OT hours: 2 hours per day, 16 hours per week, 62 hours/month in Sep. 2022 (Current month) 2 hours per day, 16 hours per week, 62 hours/month in May. 2022 (Random month) 2 hours per day, 16 hours per week, 66 hours/month in Apr. 2022 (Random month)	
J: Combined hours (standard or contracted + overtime hours = total) over 60 found? Please give details:	☐ Yes ☒ No Maximum total weekly working hours of individual worker was 56 hours.	
K: Approximate percentage of total workers on highest overtime hours:	*__100____%*	
L: Is overtime voluntary?	☒ Yes ☐ No ☐ Conflicting Information	*L1: Please detail evidence e.g. Wording of contract / employment agreement / handbook / worker interviews / refusal arrangements:* *Based on workers interview, the overtime was voluntary.*

Overtime Premiums		
M: Are the correct legal overtime premiums paid?	☒ Yes ☐ No ☐ N/A – there is no legal requirement to OT premium	*M1: Please give details of normal day overtime premium as a % of **standard** wages:* *150%, 200%, and 300% of normal rate for work overtime on standard days, rest days and statutory holidays respectively.*
N: Is overtime paid at a premium?	☒ Yes ☐ No	*N1: If yes, please describe % of workers & frequency:* *100% of workers were paid for overtime wages as local law together with normal wages, on a month basis.*
O: If the site pays less than 125% OT premium and this is allowed under local law, are there other considerations? Please complete the boxes where relevant.	☐ No ☐ Consolidated pay *(May be standard wages above minimum legal wage, with no/low overtime premium)* ☐ Collective Bargaining agreements ☐ Other NA, Workers were paid *150%, 200%, and 300% of normal rate for work overtime on standard days, rest days and statutory holidays respectively.*	
	O1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or Other	
	NA	
P: If more than 60 total hours per week and this is legally allowed, are there other considerations? Please complete the boxes where relevant.	☐ **Overtime is voluntary** ☐ Onsite Collective bargaining allows 60+ hours/week ☐ Safeguards are in place to protect worker's health and safety ☐ Site can demonstrate exceptional circumstances ☐ Other reasons (please specify) NA, not exceeded 60h.	
	P1: Please explain any checked boxes above e.g. detail of consolidated pay / CBA or other:	
	NA, not exceeded 60h.	
Q: Is there evidence that overtime hours are being used for extended periods to make up for labour shortages or increased order volumes?	☐ Yes ☒ No Q1: If yes, please give details:	
R: If sufficient workers cannot be hired, are new working time arrangements explored	☐ Yes ☒ No	

to ensure that overtime is the exception rather than the rule.	

7: No Discrimination is Practiced *(Click here to return to summary of findings)*
ETI 7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Current Systems and Evidence Examined *To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.*
Current systems: • According to management interview and worker interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs and political background, etc.; female workers and male workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill; training was based on working requirement. • There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement found. • There was no evidence of sexual harassment. • The management generally knew the requirement of Non-Discrimination. • As informed by interviewed workers, most employees spoke highly of the factory management. **Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):** Details: • The hiring and termination procedure, leave application records and employee handbook. • Payroll records • Attendance records • Termination records • Training records Any other comments: Nil

A: Gender breakdown of Management + Supervisors *(Include as one combined group)*	A1: Male: __67___ % A2: Female__33___ %
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer / laboratory analyst:	1 female engineers
C: Is there any evidence of discrimination based on race, caste, national origin, religion, age, disability,	☐ Hiring ☐ Compensation ☐ Access to training ☐ Promotion

gender, marital status, sexual orientation, union membership or political affiliation?:	☐ Termination or retirement ☒ No evidence of discrimination found C1: Please give details:

Professional Development	
A: What type of training and development are available for workers?	Employee training on EHS, Production& fire safety knowledge, Factory rules, HR policies, Wages & Benefits, Working hours etc.

B: Are HR decisions e.g. promotion, training, compensation based on objective, transparent criteria?	☒ Yes ☐ No If no, please give details:

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:

Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

8: Regular Employment Is Provided

(Click here to return to summary of findings)
(Click here to return to Key Information)

ETI

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour–only contracting, sub–contracting, or home–working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed–term contracts of employment.

Additional Elements: Responsible Recruitment

8.3 Suppliers have full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal and/or ethical requirements.
8.4 There are effective management systems in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour The supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.
8.5 Employment agencies must only supply workers registered with them.
8.6 Workers pay no recruitment fee at any stage of the recruitment process.
8.7 Worker contracts accurately reflect the agreed payment and terms in the recruitment process and are understood and signed by workers.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- The formal employees at the factory were recruited by the factory directly.
- No agency worker was used by the factory.
- No temporary worker, apprenticeship schemes or home worker was identified.
- All interviewed workers had received a signed labour contract.
- Workers' personal files were provided for review.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- The hiring and termination procedure
- Personal files
- Payroll records
- Labour contracts
- Worker and management interview

Any other comments:
Nil

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

Responsible Recruitment

All Workers	
A: Were all workers presented with terms of employment at the time of recruitment, did they understand them and are they same as current conditions?	☒ Terms & Conditions presented ☒ Understood by workers ☒ Same as actual conditions A1: If any are unchecked, please describe finding and specific category(ies) of workers affected:
B: Did workers' pay any fees, taxes, deposits or bonds for the purpose of recruitment/placement?	☐ Yes ☒ No B1: If yes, please describe details and specific category(ies) of workers affected:

C: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other – C1: If other, please give details:
D: If any checked, give details:	NA

Migrant Workers: *The term "migrant worker" refers to a person who is engaged or has been engaged in a remunerated activity in a country of which they are not a national or permanent resident or has purposely migrated on a temporary basis to another in-country region to seek and engage in a remunerated activity*		
A: Type of work undertaken by migrant workers:	There were no migrants from different countries. Domestic migrant workers were migrants from different provinces of China. Migrant workers were arranged at all working positions.	
B: Please give details about recruitment agencies for migrant workers:	B1: Total number of (in country recruitment agencies) used: 0 B2: Total number of (outside of local country) recruitment agencies used: 0	
C: Are migrant workers' voluntary deductions (such as for remittances) confirmed in writing by the worker and is evidence of the transaction supplied by the facility to the worker?	☐ Yes ☐ No C1: Please describe finding: NA. No migrant workers' voluntary deductions (such as for remittances) were identified during the audit.	C2: Observations: NA. No migrant workers' voluntary deductions (such as for remittances) were identified during the audit.
D: Are Any migrant workers in skilled, technical, or management roles	☒ Yes ☐ No	

Migrant Workers (this should include all migrant workers including permanent workers, temporary and/or seasonal workers)	D1: If yes, number and example of roles: There were 3 migrant workers engaged in management roles, and 3 migrant workers engaged in technical roles. The migrant workers were from Guangxi, Hubei, Sichuan, etc.

NON-EMPLOYEE WORKERS

Recruitment Fees:	
A: Are there any fees?	☐ Yes ☒ No
B: If yes, check all that apply:	☐ Recruitment / hiring fees ☐ Service fees ☐ Application costs ☐ Recommendation fees ☐ Placement fees ☐ Administrative, overhead or processing fees ☐ Skills tests ☐ Certifications ☐ Medical screenings ☐ Passports/ID's ☐ Work / resident permits ☐ Birth certificates ☐ Police clearance fees ☐ Any transportation and lodging costs after employment offer ☐ Any transport costs between work place and home ☐ Any relocation costs after commencement of employment ☐ New hire training / orientation fees ☐ Medical exam fees ☐ Deposit bonds or other deposits ☐ Any other non-monetary assets ☐ Other B1 – If other, please give details: NA
C: If any checked, give details:	NA

Agency Workers (if applicable) *(workers sourced from a local agent who are not directly paid by the site, but paid by the agency, Usually the agencies are paid by the site and the wages of the individual workers are paid by the agency.)*	
A: Number of agencies used (average):	A1: Names if available: N/A. No agency was used by the factory.
B: Were agency workers' age / pay / hours included within the scope of this audit?	☐ Yes ☐ No N/A. No agency was used by the factory.

C: Were sufficient documents for agency workers available for review?	☐ Yes ☐ No N/A. No agency was used by the factory.
D: Is there a legal contract / agreement with all agencies?	☐ Yes ☐ No D1: Please give details: N/A. No agency was used by the factory.
E: Does the site have a system for checking labour standards of agencies? If yes, please give details.	☐ Yes ☐ No E1: Please give details: N/A. No agency was used by the factory.

Contractors: *Note: contractors in this context are generally individuals who supply several workers to a site. Usually the contractors are paid by the site and the wages of the workers are paid by the contractor. Common terms include,* gang bosses, labor provider,	
A: Any contractors on site?	☐ Yes ☒ No A1: If yes, how many contractors are present, please give details:
B: If **Yes**, how many workers supplied by contractors?	NA
C: Do all contractor workers understand their terms of employment?	☐ Yes ☐ No C1: Please describe finding: NA
D: If **Yes**, please give evidence for contractor workers being paid per law:	NA

8A: Sub–Contracting and Homeworking

(Click here to return to summary of findings)
(Click here to return to Key Information)

8A.1 There should be no sub–contracting unless previously agreed with the main client.

8A.2 Systems and processes should be in place to manage sub–contracting, homeworking and external processing.

Note to auditor on homeworking:

Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Note to auditor on subcontracting: auditor should use this section for subcontractors of part made or wholly made finished goods, this section should not be used for raw material manufacturers unless instructed otherwise by customers

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Cross check showed that no home working present in the factory during the audit.
- No sub-contractor for production was used in the factory.
- The factory had established the subcontractor management procedure based on documents review.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

- Workers interview
- Management interview.
- Documents review

Non–compliance:

1. Description of non–compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local Law ☐ NC against customer code: Nil **Local law and/or ETI /Additional Elements requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI/Additional elements requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

Summary of sub–contracting – if applicable ☒ Not Applicable please x	
A: Has the auditor made a simple calculation to compare capacity with workers' work load in order to identify possible unrecorded work or undeclared sub-contracting	☐ Yes ☐ No A1: Please describe:
B: If sub–contractors are used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No B1: If **Yes**, summarise details:
C: Number of sub–contractors/agents used:	
D: Is there a site policy on sub–contracting?	☐ Yes ☐ No

	D1: If **Yes**, summarise details:
E: What checks are in place to ensure no child labour is being used and work is safe?	

Summary of homeworking – if applicable ☒ Not Applicable please x			
A: If homeworking is being used, is there evidence this has been agreed with the main client?	☐ Yes ☐ No A1: If **Yes**, summarise details:		
B: Number of homeworkers	B1: Male:	B2: Female:	Total:
C: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents	C1: If through agents, number of agents:	
D: Is there a site policy on homeworking?	☐ Yes ☐ No		
E: How does the site ensure worker hours and pay meet local laws for homeworkers?			
F: What processes are carried out by homeworkers?			
G: Do any contracts exist for homeworkers?	☐ Yes ☐ No G1: Please give details:		
H: Are full records of homeworkers available at the site?	☐ Yes ☐ No		

9: No Harsh or Inhumane Treatment is Allowed **(Click here to return to summary of findings)**
ETI 9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Additional elements: 9.2 companies should provide access to a confidential grievance mechanism for all workers

A: Are there published, anonymous and/or open channels available for reporting any violations of Labour standards and H&S or any other grievances to a 3rd party?	☒ Yes ☐ No A1: Please give details: There was legal department for workers to report such issues, also workers could raise grievances to local media, etc.
B: If **Yes**, are workers aware of these channels and have access? Please give details.	It was confirmed by worker interview.
C: If yes, what type of mechanism is used e.g. hotline, whistle blowing mechanism, comment box etc. Please give details.	Suggestion box, etc
D: Which of the following groups is there a grievance mechanism in place for?	☒ Workers ☐ Communities ☐ Suppliers ☐ Other D1: Please give details: Workers could raise grievances to supervisors, team leaders, or managers directly.
E: Are there any open disputes?	☐ Yes ☒ No E1: If yes, please give details
F: Does the site encourage its business partners (e.g. suppliers) to provide individuals and communities with access to effective grievance mechanisms (e.g. helplines or whistle blowing mechanism)	☒ Yes ☐ No F1: If no, please give details
G: Is there a published and transparent disciplinary procedure?	☒ Yes ☐ No G1: If no, please explain
H: If yes, are workers aware of these the disciplinary procedure?	☒ Yes ☐ No H1: If no, please give details

I: Does the disciplinary procedure allow for deductions from wages (fines) for disciplinary purposes (see wages section)?	☐ Yes ☒ No I1: If yes, please give detail

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

• The factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
• The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past.
• There was an internal process for grievance, which was an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint will be handled by management, without any reprisal for the worker in question.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
• The relevant policy on prevention of harassment and abuse.
• Internal grievance procedure documentation
• Training records
• Worker and management interview

Any other comments:
Nil

Non–compliance:

1. Description of non–compliance: ☐ NC against ETI code: ☐ NC against Local Law ☐ NC against customer Nil **Local law and/or ETI requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good Examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

10. Other Issue areas: 10A: Entitlement to Work and Immigration
(Click here to return to NC–table)

Additional Elements

10A.1 Only workers with a legal right to work shall be employed or used by the supplier.
10A.2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:
• All workers in the factory were Chinese. All workers had the proper legal rights to work in this region.
• No agency worker was used by the factory.
• The factory had established recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment.
• No foreign worker was used by the factory.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:
• Hiring procedure
• Personnel files and labor contracts
• Employee handbook
• Employee roster
• Worker and management interview

Any other comments:
Nil

Non–compliance:

1. Description of non–compliance:
☐ NC against ETI/Additional Elements ☐ NC against Local Law
☐ NC against customer code:
Nil

Local law and/or ETI /Additional Elements requirement:
Nil

Recommended corrective action:
Nil

Objective evidence observed:

Nil

Observation:	
Description of observation: Nil **Local law or ETI/Additional elements requirements:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

10. Other issue areas 10B4: Environment 4–Pillar

(Click here to return to summary of findings)

To be completed for a 4–Pillar SMETA Audit and remove the previous page which is 10B2 environment 2 pillar

B.4. Compliance Requirements

10B4.1 Businesses as a minimum must meet the requirements of local and national laws related to environmental standards.
10B4.2 Where it is a legal requirement, businesses must be able to demonstrate that they have the relevant valid permits including for use and disposal of resources e.g. water, waste etc.
10B4.3 Businesses shall be aware of their end client's environmental standards/code requirements
10B4.4 Suppliers should have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its own suppliers.
10B4.5 Suppliers shall be aware of the significant environmental impact of their site and its processes.
10B4.6 The site should measure its impacts, including continuous recording and regular reviews of use and discharge of natural resources e.g. energy use, water use (see 4–pillar audit report and audit checks for details).
10B4.7 Businesses shall make continuous improvements in their environmental performance.
10B4.8 Businesses shall have available for review any environmental certifications or any environmental management systems documentation
10B4.9 Businesses should have a nominated individual responsible for co–ordinating the site's efforts to improve environmental performance.

B4. Guidance for Observations

10B4.10 Suppliers should have completed the appropriate section of the SAQ and made it available to the auditor.
10B4.11 Has the site recently been subject to (or pending) any fines/prosecutions for noncompliance to environmental regulations.

Note for auditors and readers. This environment section is intended to take not more than 0.25 auditor days. It is an assessment only and the main requirement is to establish whether a site is meeting applicable environmental laws and/or has any certifications or environmental management systems in place. Following this assessment, the client/supplier may decide a full environmental audit is required (see also best practice guidance/environment and guidance for auditor)

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is/are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- Based on management interview and document review, factory provided EIA and EIA approval.
- The factory learned about the environment impact of their site.
- Based on workers interview, they were trained on environmental protection.
- The factory had procedure on environment protection and Mr. Yang Xiaoqiang/Factory Manager was appointed to response the compliance of environment requirement.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- Environmental policy and procedure
- All legally required environmental documents were provided for review
- Worker and management interview
- Site tour
- EIA and EIA approval

Any other comments:
Nil

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local ☐ NC against customer code: Nil **Local law and/or ETI/Additional Elements requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation:	
Description of observation: Nil **Local law or ETI/Additional elements requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

Environmental Analysis *(Site declaration only – this has not been verified by auditor. Please state units in all cases below.)*	
A: Is there a manager responsible for Environmental issues (Name and Position):	Mr. Yang Xiaoqiang/Factory Manager
B: Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	☒ Yes ☐ No B1: Please give details: The site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks, the risk assessment was provided for review.
C: Does the site have a recognised environmental system certification such as ISO 14000 or equivalent? Please give details.	☐ Yes ☒ No C1: Please give details: Not obtained.
D: Does the site have an Environmental policy? *(For guidance, please see Measurement criteria)*	☒ Yes ☐ No D1: If yes, is it publicly available? The EMS policy was established in factory and related training was conducted regularly.
E: If yes, does it address the key impacts from their operations and their commitment to improvement?	☒ Yes ☐ No E1: Please give details: Factory addressed the key impacts from their operations.
F: Does the site have a Biodiversity policy? *(For guidance, please see Measurement criteria)*	☒ Yes ☐ No F1: Please give details: The factory had conducted EIA and obtained the approval, which showed that there was no significant impact to the ecological environment by the factory. Also, the factory had established environmental protection policy, conservation of biodiversity was covered in it.
G: Is there any other sustainability systems present such as Chain of Custody, Forest Stewardship Council (FSC), Marine Stewardship Council (MSC) etc.? Please gives details. *(For guidance, please see Measurement criteria)*	☐ Yes ☐ No G1: Please give details: NA. No other sustainability systems was present in the factory.
H: Have all legally required permits been shown? Please gives details.	☒ Yes ☐ No H1: Please give details: The factory had obtained the EIA approval.
I: Is there a documentation process to record hazardous chemicals used in the manufacturing process?	☒ Yes ☐ No ☐ N/A I1: Please give details: The factory established a documentation process to record hazardous chemicals.
J: Is there a system for managing client's requirements and legislation in the destination	☒ Yes ☐ No J1: Please give details:

countries regarding environmental and chemical issues?	The factory established a management system on environmental and chemical issues such as the environment policy, risk assessment on environment.
K: Facility has reduction targets in place for environmental aspects e.g. water consumption and discharge, waste, energy and green-house gas emissions:	☒ Yes ☐ No K1: Please give details: Water and energy usage, and waste are monitored with reduction targets to reduce costs.
L: Facility has evidence of waste recycling and is monitoring volume of waste that is recycled.	☒ Yes ☐ No L1: Please give details: Weights of recycled waste are recorded for continuous improvement targets.
M: Does the facility have a system in place for accurately measuring and monitoring consumption of key utilities of water, energy and natural resources that follows recognised protocols or standards?	☒ Yes ☐ No M1: Please give details: Measured to reduce costs.
N: Has the facility checked that any Sub-Contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	☒ Yes ☐ No N1: Please give details: The factory had checked business partners operating on the premises have appropriate permits and licences and are conducting business in line with environmental expectations of the facility

Usage/Discharge analysis		
Criteria	Previous year: Please state period: _ From Oct. 2020 to Sep. 2021_____	Current Year: Please state period: __From Oct. 2021 to Sep. 2022_____
Electricity Usage: *Kw/hrs*	171978 Kw/hrs	148076 Kw/hrs
Renewable Energy Usage: *Kw/hrs*	0 Kw/hrs	0 Kw/hrs
Gas Usage: *Kw/hrs*	0 Kw/hrs	0 Kw/hrs
Has site completed any carbon Footprint Analysis?	☐ Yes ☒ No	☐ Yes ☒ No
If **Yes**, please state result	NA	NA
Water Sources: *Please list all sources e.g. lake, river, and local water authority.*	From water supply company	From water supply company
Water Volume Used: *(m³)*	5344 M3	4105 M3
Water Discharged: *Please list all receiving waters/recipients.*	• Municipal sewage •	• Municipal sewage •

Water Volume Discharged: *(m³)*	5344 M3	4105 M3
Water Volume Recycled: *(m³)*	0 M3	0 M3
Total waste Produced *(please state units)*	2.5 ton	2.5 ton
Total hazardous waste Produced: *(please state units)*	1.5 ton	1.5 ton
Waste to Recycling: *(please state units)*	0 ton	0 ton
Waste to Landfill: *(please state units)*	0 ton	0 ton
Waste to other: *(please give details and state units)*	1 ton	1 ton
Total Product Produced *(please state units)*	2507884 pcs	207836 pcs

10C: Business Ethics – 4-Pillar Audit

(Click here to return to summary of findings)

To be completed for a 4–Pillar SMETA Audit

10C. Compliance Requirements

10C.1 Businesses shall conduct their business ethically without bribery, corruption, or any type of fraudulent Business Practice.
10C.2 Businesses as a minimum must meet the requirements of local and national laws related to bribery, corruption, or any type of fraudulent Business Practices.
10C.3 Where it is a legal requirement, businesses must be able to demonstrate that they comply with all fiscal legislative requirements.
10C.4 Businesses shall have access to a transparent system in place for confidentially reporting, and dealing with unethical Business Ethics without fear of reprisals towards the reporter.
10C.5 Businesses should have a Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice,
10C.6 Businesses should have a designated person responsible for implementing standards concerning Business Ethics
10C.7 Suppliers should ensure that the staff whose job roles carry a higher level of risk in the area of ethical Business Practice e.g. sales, purchasing, logistics are trained on what action to take in the event of an issue arising in their area.

10C. Guidance for Observations

10C.8 Businesses should communicate their Business Ethics policy, covering bribery, corruption, or any type of fraudulent Business Practice to all appropriate parties, including its own suppliers.
10C.9 Has the site recently been subject to (or pending) any fines/prosecutions for non-compliance to Business Ethics regulations. If so is there evidence that sustainable corrective actions have been implemented

Note for auditors and readers. This Business Ethics section is intended to take not more than 0.25 auditor days. It is an assessment not an audit.

Current Systems and Evidence Examined

To complete 'current systems' Auditors examine policies and written procedures in conjunction with relevant managers, to understand, and record what controls and processes are currently in place e.g. record what policies are in place, what relevant procedures are carried out, who is /are responsible for the management of this item of the code. Evidence checked should detail any documentary or verbal evidence shown to support the systems.

Current systems:

- 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.
- The company established a business ethics policy which was communicated to workers through posters and training.
- The site had received and read the Business Ethics policy of the auditor/audit company.
- There is an internal grievance process, which is an anonymous email address.

Evidence examined – to support system description (Documents examined & relevant comments. Include renewal/expiry date where appropriate):

Details:

- The company business ethics policy
- Bribery and Corruption policy
- Training records
- Worker handbook

Any other comments:
Nil

Non–compliance:	
1. Description of non–compliance: ☐ NC against ETI/Additional Elements ☐ NC against Local ☐ NC against customer code: Nil **Local law and/or ETI/Additional Elements requirement:** Nil **Recommended corrective action:** Nil	**Objective evidence observed:** Nil

Observation	
Description of observation: Nil **Local law or ETI/Additional elements requirement:** Nil **Comments:** Nil	**Objective evidence observed:** Nil

Good examples observed:	
Description of Good Example (GE): Nil	**Objective Evidence Observed:** Nil

A: Does the facility have a Business Ethics Policy and is the policy communicated and applied internally, externally or both, as appropriate?	☒ Internal Policy ☐ Policy for third parties including suppliers A1: Please give details: There is a written policy on the need to avoid bribes and fraudulent practices.

B: Does the site give training to relevant personnel (e.g. sales and logistics) on business ethics issues?	☒ Yes ☐ No B1: Please give details: The factory provided training to relevant personnel on business ethics issues.
C: Is the policy updated on a regular (as needed) basis?	☒ Yes ☐ No C1: Please give details: Examined each year by HR department and adjusted if needed.
D: Does the site require third parties including suppliers to complete their own business ethics training	☒ Yes ☐ No D1: Please give details: The site required third parties including suppliers to complete their own business ethics training.

Other findings

Other Findings Outside the Scope of the Code
Nil

Community Benefits *(Please list below any specific community benefits that the site management stated that they were involved in, for example, HIV programme, education, sports facilities)*
Nil

Appendix 1

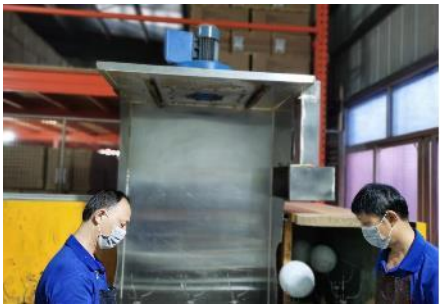
Comparison between ETI code and Customer's Supplier's Code. Any areas where a site complies with the Customer's Supplier Code, but not with the ETI code are discussed at the audit close out meeting and recorded on the CAPR. Note to supplier "for this customer it may not be necessary to complete corrective actions where NC's DO NOT meet the ETI code, but DO meet your customer's code. If the audit is shared with other customers who work to the ETI code or an equivalent international standard, corrective actions will be necessary."

☒ Not Applicable please x

Photo Form

NC

No. 1: About 80% gluing workers wore one-off surgical mask instead of activated carbon mask (although provided).	No. 2: About 80% gluing workers wore one-off surgical mask instead of activated carbon mask (although provided).	No. 3: Workers' monthly overtime working hours exceeded legal requirement.

		*Nil*
The factory had provided occupational health examination summary report.	The gluing workers were wearing activated carbon mask when working.	Nil

GE

	Nil	*Nil*
No. 1: The factory provided free work meals for workers.	Nil	Nil

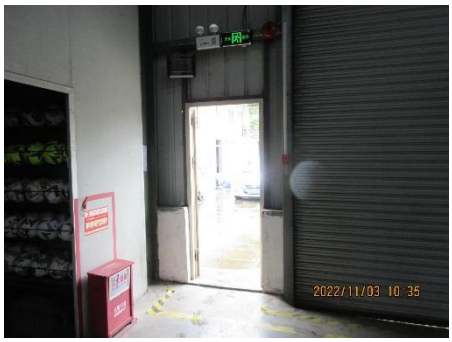
General Photos

Factory Gate	Factory Name & Address	GPS

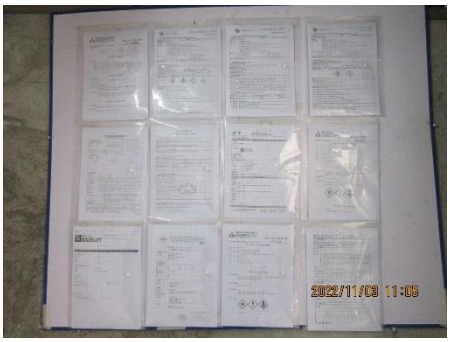
Production Building	Incoming Material Storage	Polishing

Cutting	Digital Printing	Top Gluing

Top Coating	Panel Folding & Edge Gluing	Ball Assembly

Ball Foaming	Ball Shaping	Ball Gluing
		
Inspection & Packing	Finished Product Warehouse	Emergency Exit, Exit Sign, Emergency Lighting & Fire Extinguishers
Fire Hydrant, Fire Alarm & Evacuation Plan	Evacuation Indicator	First Aid Kit, Eye Wash Facility, PPE Warning Sign & Suggestion Box

Portable Water	Toilet	Chemical Warehouse

		
Safety Label	MSDS Posted Onsite	Hazardous Waste Storage

Electricity Box with Inner Protective Cover	Employee With PPE	Attendance Recorder

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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

You can leave feedback by following the appropriate link to our questionnaire:

Click here for Buyer (A) & Buyer/Supplier (A/B) members:

http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

Click here for Supplier (B) members:

http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRglY_2brg_3d_3d

Click here for Auditors:

https://www.surveymonkey.co.uk/r/BRTVCKP