SMETA
powered by Sedex

Sedex Members Ethical Trade Audit Report

Version 7

Sedex, 18 St Swithin's Lane, London, EC4N 8AD, United Kingdom

Contents

Audit content

(1) A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
  - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
  - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
  - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

(2) Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

(3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

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Findings →

SMETA powered by Sedex

Audit details

Site details

Sedex site reference	ZS410901661	**Site name**	MULTISTEPS PLASTICS (DONG GUAN) CO LTD
Business name	MULTISTEPS PLASTICS (DONG GUAN) CO LTD	**Site address**	Room 102, Building 1, No.1, Qinghu East Road, Qingxi Town 东莞市 CN 523641

Audit details

Sedex company reference	ZC410620296	**Auditor company name**	SGS-China
Audit company address	No. 430, Jihua Road, Bantian, Longgang District, Shenzhen, CN, 518129		
Date of audit	2026-03-25	**Audit conducted by**	Ronnie Zeng
Audit pillars	Labour Standards | Health and safety | Environment 4-Pillar | Business ethics		

Time in and out	Day 1		Day 2	
	In	13:30	In	09:00
	Out	17:30	Out	17:00
Audit type	Periodic			
Was the audit announced?	Announced			

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Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Dong Xiaokang / Admin Supervisor
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	No trade union was established in the factory.		
Reason for absence during the audit	No trade union was established in the factory.		
Reason for absence at the closing meeting	No trade union was established in the factory.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. 1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. 2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post–audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	工厂仅租用了一栋7层厂房B的一楼1/2面积、二楼、三楼3/4面积、四楼到七楼用作车间、仓库和办公室，一栋8层宿舍楼的二楼、三楼用作宿舍。同一栋建筑的其他区域则由另外两家工厂租用。通过员工访谈、管理层访谈、现场走访以及资料审阅，没有发现员工或者区域混用的情况。本次审核只包括审核工厂租用的区域。

Lead auditor	Ronnie Zeng	**APSCA Number**	21703442
Additional auditor			
Date of declaration	2026-03-26		

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Findings →

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Dong Xiaokang
Title	Admin Supervisor
Date of declaration	2026-03-26

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601355440
	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601365957
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365955
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365956
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365958
	3.N Ensure that all hazardous substances (e.g...	Local law Base code	NC ZAF601355437
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF601355438
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF601355439
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE ZAF601365959

Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen	✓	✓	ⓘ	✓
1.A. Responsible recruitment and entitlement to work	✓	✓	ⓘ	✓
2. Freedom of association and right to collective bargaining are respected	✓	✓	✓	ⓘ
3. Working conditions are safe and hygienic	✓	✓	ⓘ	⚠
4. Child labour shall not be used	✓	✓	ⓘ	✓
5. Legal wages are paid	✓	✓	ⓘ	✓
6. Working hours are not excessive	✓	✓	ⓘ	✓
7. No discrimination is practiced	✓	✓	ⓘ	✓
8. Regular employment is provided	✓	✓	ⓘ	✓

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

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

✗ Not addressed

⚠ Fundamental improvements required

ⓘ Some improvements recommended

✓ Robust management systems

← Summary of findings

Site details →

Site details

Company and site details

Sedex company reference	ZC410620296	
Sedex site reference	ZS410901661	
Company name	MULTISTEPS PLASTICS (DONG GUAN) CO LTD	
Business ownership type	GOODS	
Site name	MULTISTEPS PLASTICS (DONG GUAN) CO LTD	
Site name in local language	展能塑胶（东莞）有限公司	
GPS location	**GPS address**	Room 102, Building 1, No.1 Qinghu East Road, Qingxi Town, Dongguan City, Guangdong Province, China.
	Coordinates	Latitude: N 22°48'36'' Longitude: E 114°10'42''
Is the worksite in a remote location, far from habitation?	No	
Site contact	**Contact name**	Dong Xiaokang
	Job title	Admin Supervisor
	Phone number	0769-39012199
	Email	zhanneng0711@163.com
Applicable business and other legally required business license numbers and documents	Business license number: 91441900058590867H. Valid date: From Dec 20, 2012 to Dec 20, 2027.	

← Management systems

Worker analysis →

Site activities

Site function	Factory Processing/Manufacturer	
Site activities	**Primary**	Manufacture of plastics and synthetic rubber in primary forms
	Secondary	
	Other	
Product type	Disposable PET food packaging boxes.	
Process overview	The main products in the factory were disposable PET food packaging boxes. The main production processes were: Vacuum forming, Label attaching, Punching, Inspection & Inner packing, Outer packing. The main production equipment and lines were 8 blow molding machines, 6 packing machines, 5 label attaching machines and 8 production lines etc.	
What level of mechanization best describes the work at this site?	Fair mechanisation / manual Labour	

Site scope

Is the audited site a physically continuous area?	No The audited factory only rented and used 1/2 areas of the 1F, the 2F, 3/4 areas of the 3F, the 4-7F of one 7-storey production building B as workshop, warehouse and office, and the 2F & 3F of one 8-storey dormitory building as dormitory rooms.

← Management systems

Worker analysis →

Site scope

Building 1	**Last construction works on site**	2024
	If building is shared, provide details	The audited factory only rented and used 1/2 areas of the 1F, the 2F, 3/4 areas of the 3F, the 4-7F of one 7-storey production building B as workshop, warehouse and office.
	Number of floors	7
	Description of floor activities	1-6F was completed in 20177F was completed in 2024. 1F: Workshop and warehouse; Other 1/2 area was used by Dongguan Zhanneng Mold Co., Ltd. 2F: Workshop and warehouse. 3F: Molds room and warehouse; Other 1/4 area was used by Dongguan Zhanneng Mold Co., Ltd. 4-7F: Warehouse.
Building 2	**Last construction works on site**	2017
	If building is shared, provide details	The audited factory only rented the 2F & 3F of one 8-storey dormitory building as dormitory rooms.
	Number of floors	8
	Description of floor activities	1F: Canteen & Kitchen of Industrial Zone. 2-3F: Dormitory rooms rented and used by the audited factory. 4-7F: Rented and used by other 2 factories. 8F: Used by the building owner.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	

← Site details

Worker analysis →

Site scope

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No
Is any activity conducted onsite not included within the scope of the audit?	No

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	Yes
Is the accommodation within the perimeter of the site audited?	Onsite
Is the accommodation contractually mandated for workers?	Optional
Who provides the accommodation?	Site
Was all accommodation (whether directly or via third parties, off or onsite) included in this audit?	All Yes, the 2F and 3F of the dormitory building rented and used by the audited factory were included at this audit.
Does the site organise worker transport to the worksite?	Not provided Workers arrange their own commutes.

← Site details

Worker analysis →

Work patterns

Approximate workers on site per month (% of peak)	**January**	80-90%	**February**	80-90%
	March	90-100%	**April**	90-100%
	May	90-100%	**June**	90-100%
	July	90-100%	**August**	90-100%
	September	90-100%	**October**	90-100%
	November	90-100%	**December**	90-100%

Is there any night shift work at the site?	Yes 3 shifts (8:00-16:00, 16:00-24:00, 00:00-08:00) were arranged for production workers, and one shift was available for office staff (8:00-12:00; 13:30-17:30).
What night shift audit activities were conducted?	Interviews conducted during day shift (rotated workers)
What percentage of the workforce, including temporary and agency workers, work during the night shift?	90%
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes The audit was conducted during all shift times, including a sample of 9 night shift workers in interview and sampling.

Site assessments

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

← Site details

Worker analysis →

Site assessments

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	No The site did not assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No No HRIA was conducted within the last three years at this site.

← Site details

Worker analysis →

Worker analysis

Gender disaggregated data available	Men and women

Worker totals

	Men		Women		Other		Total	
Number of workers	47	*(58.8%)*	33	*(41.3%)*	-	-	80	*(100%)*

Workers by type

	Men		Women		Other		Total	
Permanent workers (employees)	47	*(58.8%)*	33	*(41.3%)*	-	-	80	*(100%)*
Temporary or fixed term employees	0	-	0	-	-	-	0	*(0%)*
Agency or subcontracted workers	0	-	0	-	-	-	0	*(0%)*
Seasonal workers	0	-	0	-	-	-	0	*(0%)*
Self-employed workers	0	-	0	-	-	-	0	*(0%)*
Informal workers including home workers	0	-	0	-	-	-	0	*(0%)*
Apprentices, trainees or interns	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Site details

Worker interviews →

Migrant workers

	Men		Women		Other		Total	
Domestic migrant workers	37	*(61.7%)*	23	*(38.3%)*	-	-	60	*(75%)*
International migrant workers	0	-	0	-	-	-	0	*(0%)*
Total migrant workers	37	*(61.7%)*	23	*(38.3%)*	-	-	60	*(75%)*

* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from Employees from other provinces: Hunan, Guangxi, Hubei, etc.

Workers by age

	Men		Women		Other		Total	
18 - 24 years old	3	*(60%)*	2	*(40%)*	-	-	5	*(6.3%)*
15 - 17 years old	0	-	0	-	-	-	0	*(0%)*
Under 15 years old	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

← Worker analysis

Worker interviews →

Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	The factory has no obvious production off-season. The number of workers is not affected by seasons.
Please list the nationalities of all workers, with the three most common nationalities listed first	Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	59%	41%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 *(0%)*
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 *(0%)*
Workers paid hourly / daily rate	47 *(58.8%)*	33 *(41.3%)*	- -	80 *(100%)*
Salaried workers	0 -	0 -	- -	0 *(0%)*

* % of total workforce

Workers by payment cycle

	Men		Women		Other		Total	
Paid daily	0	-	0	-	-	-	0	*(0%)*
Paid weekly	0	-	0	-	-	-	0	*(0%)*
Paid monthly	47	*(58.8%)*	33	*(41.3%)*	-	-	80	*(100%)*
Other	0	-	0	-	-	-	0	*(0%)*

* % of total workforce

If other payment cycle entered, please provide details	NA.

People in managerial, supervisorial and administrative roles

	Men		Women		Other		Total
Employees in management positions	6	*(60%)*	4	*(40%)*	-	-	10
Supervisors or team leaders	5	*(50%)*	5	*(50%)*	-	-	10
Administrative staff	10	*(62.5%)*	6	*(37.5%)*	-	-	16

Worker interview summary

Gender disaggregated data available	Men and women
Which methods of worker engagement were used?	Individual interviews Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?	
Was the interview sample representative of all types of nationality and employment types of workers?	Yes
Was the interview sample representative of the gender composition of the workforce?	Yes
Number and size of group interviews	One group with 5 workers, total 5 workers.
Did workers understand the purpose of the audit?	Yes
Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?	Yes

← Worker analysis
Measuring workplace impact →

Was there any indication that workers had been 'coached' in how they should respond to questions?	No
What was the general attitude of the workers towards their workplace?	Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Other (provide details) No significant concerns or complaints raised by workers.
What did the workers like the most about working at this site?	Communication (e.g. from management) Freedom of movement Social benefits & insurance (e.g. ability to book annual leave, maternity leave, pensions etc.)
Additional comments	All workers showed a cooperative attitude during the interview process. The worker's interview was conducted independently without the influence of the management. All workers expressed their positive attitude to management and workplace. They agreed with the rules and management of the factory and said that they were satisfied with working condition, payments, and benefits.
Attitude of workers' committee/union representatives	Interviewed with the worker representative, who said factory management were very care about workers and pay more attention to deal with workers' suggestion or complain. The worker representative showed that the management were kind and the workplace was comfortable. No negative information was identified.
Attitude of managers	Management interview was conducted through the audit. The factory management agreed that the auditor could access to all facilities, compound documents and records requested by the audit; take photo of the factory, copy relevant document records and conduct confidential workers 'interview.

Workers interviewed by type

	Total

← Worker analysis
Measuring workplace impact →

Workers interviewed by type

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

Workers interviewed by group/individual

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

← Worker analysis

Measuring workplace impact →

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	6	2	-	8
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	6	2	-	8

Measuring workplace impact

Gender disaggregated data available	Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	1.0%	-	3.0%
Last full calendar year (2025)	3.0%	3.0%	-	6.0%
Previous full calendar year (2024)	3.4%	3.9%	-	7.3%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.5%	0.6%	-	1.1%
Last full calendar year (2025)	0.5%	1.0%	-	1.5%
Previous full calendar year (2024)	0.4%	1.1%	-	1.5%

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

Are accidents recorded?	Yes The factory provided work injury records for the past two years for review, and no work injuries occurred.

← Worker interviews

Code area 0 →

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%

← Worker interviews

Code area 0 →

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

Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2025)	0.0%	0.0%	-	0.0%
Previous full calendar year (2024)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1. The factory allow auditor to conduct the audit without obstruction to all requested documents, interview as well as the observation. 2. Mr. Guo Liming / Manager was appointed as senior member of management to provide assistant for auditor at this audit. 3. No integrity was attempted after the INTEGRITY STATEMENT at the opening meeting and the factory showed an open attitude to auditor during the whole audit. 4. There was a written human rights policy statement that was approved by their chairman, and the policy was communicated to related workers with training records for review. Evidence examined: Management interview Worker interview Human right policy statement, training records etc.

← Measuring workplace impact

Code area 1 →

0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were any external stakeholders such as consultants, customer representatives, industry experts etc. present during the audit?	No

← Code area 0

Code area 1 →

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: Management Procedure outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Workers can freely choose their careers. Resources: A HR manager is assigned responsibility for implementation, and aware of the responsibilities. The HR manager has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory. Training: All workers have done a series of relevant training. They are trained to recognize genuine and fake documents. There are also mechanisms to communicate with government agencies if needed for additional information or clarifications. However, they had not evaluated the effectiveness of worker training, some interviewed workers were not clear about the detailed requirement. Monitoring: By reporting to the responsible person, the compliance of the relevant departments to monitor the process and developing relevant mechanisms to monitor whether the operators have implemented the process, the factory retains relevant training records. Management conducts regular spot checks on the monitored situation to ensure that no violations of procedures have occurred.

← Code area 0

Code area 1.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1. The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification. 2. The workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment. 3. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours. 4. No forced, bonded, or involuntary prison labour was identified during the audit. Evidence examined: Factory rules Employee handbook Personnel files Resignation records Labour contracts Management and worker interview

← Code area 0

Code area 1.A →

1. Employment is freely chosen

Data points

If required under local law, is there a published 'modern slavery' or similar statement?	Not Applicable
Does the site utilise any workers who are prisoners?	No
Does the site use the labour of persons required to work under any government scheme?	No

← Code area 1

Code area 1.A →

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The factory had established written policies and procedures for recruitment management, promotion system and labor file management. These policies refer to "Social Responsibility Management Manual" and "Employee Manual", which Outlines the main mechanisms for worker recruitment. These procedures include provisions for young workers, women workers and pregnant workers. These policies are regularly reviewed and updated. Resources: A senior HR manager was assigned responsibility for implementation alongside an operations manager, and both were aware of their responsibilities. They have received a high level of external training on recruitment policy and have used their knowledge to develop effective processes in place. Training: Training at site was governed by a training procedure which is the specific responsibility of the Training Manager. The recruitment policy was available and communicated to all workers. However, the training does not cover the requirement of "recruitment fee". Monitoring: Each workshop supervisor reported to the HR manager, the department monitors compliance with the process, and the factory holds a social responsibility internal audit plan on a regular basis.

← Code area 1 Code area 2 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current system: 1.Per documents review, factory management representation and employee interview, all employees in the factory were Chinese, no migrant employees from other country was noted in the factory. 2.All employees had the proper legal rights to work in this region. 3.The youngest employee found within the sample was 18 years old. All of them were recruited directly by the facility. 4.No agency was used in facility's for recruitment process, the factory has clearly stipulated in the recruitment process that it will not charge any fees from workers. Evidence examined: - Recruitment Policy and Procedures. - Duties and responsibilities of the Plant Head and Accounts/HR Executive. - Personal files. - Internal Regulations. - Worker interview.

← Code area 1

Code area 2 →

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

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

Migrant workers

Do any workers migrate across international borders to work at this site?	No

← Code area 1.A

Code area 2 →

Percentage of workers that are migrant	75%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	75% workers were migrant from Hunan, Guangxi, Hubei province, and they worked at the same positions as local workers.

Recruitment fees

Have any workers who started at this site in the last 12 months (new workers) paid any recruitment fees or associated costs, such as visas or travel, which have not been fully repaid?	No - the site has paid all recruitment costs for new workers in advance
Select 1 to 3 sending countries/regions of new workers. Record fees and costs in the following tables.	China

New workers totals

	China
Number of workers	13

Recruitment fees

	China
Payments made in exchange for work	✓
Recruitment services which are not optional	-

← Code area 1.A

Code area 2 →

Recruitment fees

Other or uncategorised	-

Related costs

	China
Medical costs	✓
Insurance costs	-
Skills and qualification tests	-
Training and orientation	-
Equipment costs	-
Travel costs	-
Accommodation costs	-
Administrative costs	-
Other or uncategorised	-

Illegitimate costs

	China
Payments made to illegitimate actors involved in the recruitment process	-

← Code area 1.A

Code area 2 →

Illegitimate costs

Payments made to illegitimate actors during the course of employment	-
Other or uncategorised	-

Was any worker in this group in debt as a result of these costs?

	China
Yes - to a recruiter	-
Yes - to the audited site	-
Yes - to a third party	-
No - could not verify	✓

Highest total costs incurred

	China
Currency	CNY
Highest total costs incurred	110.0

Additional comments NA

← Code area 1.A

Code area 2 →

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	Policies and Procedures: The factory "Employee Representative Election Procedure" outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area, and further detail could be found in the worker representative document. Documents clearly assigned responsibilities, processes in place and address all code areas. Resources: A senior Admin manager was assigned responsibility for implementation and aware of his responsibilities. Organize worker representative election activities. Training: The factory provided relevant training to all workers and encouraged them to select worker representatives. Workers interviewed said that the training encouraged them to associate freely and speak freely if they had complaints. Monitoring: The worker representatives held regular meetings, recorded the meeting content and the problems reported by workers, and reported to the management. However, The suggestion box has not received any appeal related records and has not been evaluated or adjusted.

← Code area 1.A

Code area 3 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current systems: 1. The 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). Consequently, 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. 2. No trade union was established in the factory, but 2 worker representatives were elected in the factory. One worker representative attended the opening and closing meeting during the audit. 3. The worker representatives' meeting was conducted quarterly. 4. Through worker interview, the worker could raise their grievances or complaint through worker representative or management directly. Evidence examined: The policy on freedom of association Interview with workers and management Interview with worker representative Election and meeting minutes

← Code area 1.A

Code area 3 →

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

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are there alternative worker representative bodies in place?	Yes, worker committee
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Not Applicable
Does the membership reflect the nationality composition of the workforce?	Not Applicable

Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

← Code area 2

Code area 3 →

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required
Explanation for management systems grades	Policies and procedures: The factory has established a detailed policy on health and safety, such as 'Social responsibility program files. The policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area, and further detail can be found in the EHS management procedures. Documents clearly assign responsibilities, processes in place and address all code areas. Resources: Factory director was assigned responsibility for implementation alongside senior production supervisors, and they are aware of their responsibilities. The related management have received a high level of external training on EHS and have used the knowledge to develop effective processes in place. Training: The workers received internal training regularly. Compliance with processes was monitored by the department reporting to the EHS Management. There were at least 2 exits from each work area. But some interviewed workers were not clear about the detailed requirement, such as the requirements of fire drill. And the factory reviewed its performance on social compliance regularly, including health and safety. Monitoring: Compliance with processes was monitored by the factory, but the monitoring was not effective enough. Some findings such as PPE, occupational health examination, etc. were identified. Failure in the monitoring has led to the NCs.

← Code area 2

Code area 4 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601355440
	3.A Ensure a safe working environment. Put in...	Local law Base code	NC ZAF601365957
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365955
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365956
	3.H Where identified as necessary to reduce r...	Local law Base code	NC ZAF601365958
	3.N Ensure that all hazardous substances (e.g...	Local law Base code	NC ZAF601355437
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF601355438
	3.O Implement an appropriate electrical safet...	Local law Base code	NC ZAF601355439

← Code area 2

Code area 4 →

Systems and evidence examined to validate this code section	Current systems: 1. General Health and Safety management • Mr. Guo Liming/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 always available 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, 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 at the site 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. • Sufficient first aiders were available in the factory and the certificates were provided for review. Evidence examined: 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

← Code area 2 Code area 4 →

Onsite observation
Worker and management interview

Findings: non-compliances

ZAF601355440

Non-compliance

Due 2025-06-09

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

319 - Lack of records/missing documentation for medical examinations or occupational health checks of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Description

Based on the provided occupational health check agreement and the receipt, the factory provided occupational health checks for 83 workers working incontact with noise and 3 workers working in contact with dust and noise on March 31, 2025, but the reports were not obtained yet.
根据提供的职业健康检查委托书以及发票，工厂在2025年3月31号给83名接触到噪声的员工以及3名接触到粉尘和噪声的员工提供了职业病健康检查体检，但尚未取得报告。

Description (carried over)

Based on the provided occupational health check agreement and the receipt, the factory provided occupational health checks for 83 workers working incontact with noise and 3 workers working in contact with dust and noise on March 31, 2025, but the reports were not obtained yet.
根据提供的职业健康检查委托书以及发票，工厂在2025年3月31号给83名接触到噪声的员工以及3名接触到粉尘和噪声的员工提供了职业病健康检查体检，但尚未取得报告。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the factory should arrange the occupational health checks more earlier to ensure the reports can be obtain timely.
建议工厂更早安排职业病加健康体检以便及时获得报告。

Status

Closed (2026-03-26)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Intended corrective and preventative actions, based on root cause analysis (carried over)

It is recommended that the factory should arrange the occupational health checks more earlier to ensure the reports can be obtain timely.
建议工厂更早安排职业病加健康体检以便及时获得报告。

Local law reference

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 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....

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601365957

Non-compliance

Due 2026-05-31

Code area	Status
3 Working conditions are safe and hygienic	Closed (2026-08-03)*

← Code area 3

Code area 4 →

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Issue title

318 - Inadequate/isolated failure in conducting medical examinations or occupational health checks, including disease checks, of workers in hazardous situations(e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Description

According to management interview and document review, the factory provided on-the-job occupational health examinations for 41 workers exposed to noise, but did not provide on-the-job occupational health examination for one crushing worker exposed to dust and noise, nor did it provide pre-job and off-the-job occupational health examinations for workers exposed to occupational hazards (noise and dust).
根据管理层访谈以及文件审核，工厂为41名接触噪声的工人提供了在岗期间职业健康体检，但没有为1名接触粉尘和噪声的碎料员工提供了在岗期间职业健康体检，没有为接触职业危害因素（噪音和粉尘）的员工提供岗前及岗后的职业健康体检。

Intended corrective and preventative actions, based on root cause analysis

The factory should provide pre-job, on-the-job, and off-the-job occupational health examinations for workers exposed to occupational hazards.
工厂为接触职业危害因素的员工提供岗前、岗中和离岗后职业健康体检。

Local law reference

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.

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601365955

Non-compliance

Due 2026-05-31

← Code area 3

Code area 4 →

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title

279 - No/inadequate training in how to use Personal Protective Equipment (PPE)

Description

Two workers in vacuum forming workshop did not wear the protective earplugs provided by the factory.
吸塑成型车间有两名员工未佩戴工厂提供的耳塞。

Intended corrective and preventative actions, based on root cause analysis

The factory should supervise and educate employees to wear PPE. 工厂应监督教育员工佩戴PPE。

Local law reference

Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 22
Employers must adopt effective protective facilities against occupational diseases and provide employees with occupational disease protection items for personal use.
The occupational disease protection items for personal use provided by an employer to its employees must meet the requirements for the prevention and control of occupational diseases; and those failing to meet such requirements shall not be used.

Evidence

[The worker in vacuum forming workshop did not wear the protective earplugs..JPG]

Status

Closed (2026-08-03)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

* PDF generated at 03:07 (UTC) on 03 Aug 2026. [View this finding on the Sedex platform] for live updates and closure details.

ZAF601365956

Non-compliance

Due 2026-05-01

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title

277 - Workers are not issued with Personal Protective Equipment, or it is not appropriate to the risk - isolated

Description

The factory provided a disposable mask instead of a dust-proof mask for one crushing worker.
工厂为1名碎料工人提供的是一次性口罩而不是防尘口罩。

Intended corrective and preventative actions, based on root cause analysis

The factory should provide suitable personal protective equipment for crushing worker.
工厂应为碎料工人提供合适的劳保用品。

Local law reference

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.

Evidence

Status

Closed (2026-08-03)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

[The factory provided a disposable mask instead of a dust-proof mask for one crushing worker..JPG]

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601365958

Non-compliance

Due 2026-05-01

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.H Where identified as necessary to reduce residual risk, provide (without charge to workers) and ensure the use of appropriate personal protective equipment (PPE).

Issue title

281 - Lack of adequate/appropriate signage in high risk areas on usage of PPE (e.g. importance of ear plugs for high noise or specific PPE for chemical use/handling)

Description

Based on onsite observation, the factory did not post occupational hazard factor notices and warning signs at positions with noise and dust in the production workshop.
根据现场观察发现，工厂没有在生产车间存在噪声及粉尘的岗位张贴职业危害因素告知和警示标识。

Intended corrective and preventative actions, based on root cause analysis

The factory should post occupational hazard factor notices and warning signs at positions with noise and dust.
工厂应在存在噪声及粉尘的岗位张贴职业危害因素告知和警示标识。

Status

Closed (2026-08-03)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Local law reference

Warning Signs for Occupational Hazards in the WorkplaceGBZ 158-20038. Setting of warning signs in workplace where other occupational hazards exited
In the workplace where there is dust, the "caution dust " sign and "must wear dustproof mask" direction sign are set.
In the workplace where occupational burns and corrosion are possible, the warning signs of "Warning corrosion" and "must wear protective clothing", " must wear protective gloves", " must wear protective shoes" and other direction signs are set up.
In the workplace with noise hazard, the "noise harmful" warning sign and the "must wear ear protector" direction signs are set up.
In high temperature workplace, warning sign for "warning high temperature" is set.
In the workplaces that can cause electro-optic ophthalmia, the “warning arc” warning signs and the "must wear protective glasses" direction signs are set up.
In the workplace where biological occupational hazards exist, the “warning infection” warning signs and the corresponding direction signs are set up.
In the workplace where radioisotopes exist and radioactive devices are used, the “warning ionizing radiation” warning signs and the corresponding direction signs are set up.

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601355437

Non-compliance

Due 2025-05-10

Code area

3 Working conditions are safe and hygienic

Workplace requirement

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

Issue title

242 - No/inadequate eye wash/shower station in hazardous environments including chemical areas

Description

The pressure of the water outlet at one side of the eye washing facility for the chemical warehouse was insufficient.
工厂给化学品仓库设置的洗眼器一边出水口的水压不足。

Status

Closed (2026-03-26)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Description (carried over)

The pressure of the water outlet at one side of the eye washing facility for the chemical warehouse was insufficient.
工厂给化学品仓库设置的洗眼器一边出水口的水压不足。

Intended corrective and preventative actions, based on root cause analysis

It is recommended that the factory should adopt correct measures to ensure sufficient pressure for the water outlet of eye washing machine.
建议工厂应采取正确的措施确保洗眼器出水口水压充足。

Intended corrective and preventative actions, based on root cause analysis (carried over)

It is recommended that the factory should adopt correct measures to ensure sufficient pressure for the water outlet of eye washing machine.
建议工厂应采取正确的措施确保洗眼器出水口水压充足。

Local law reference

Eye and face protection-Emergency shower and eyewash equipment-Part 1: Technical requirements (GB/T 38144.1-2019)
6.2.1 General requirements
6.2.1.2 It shall be ensured that the flushing fluid can maintain a low flow rate to flush the eyes without causing damage to the eyes.
6.2.1.8 The flushing fluid shall be provided at a flow rate of at least 1.5L/min and could be kept washing eyes for at least 15 minutes.

Evidence

NC Insufficient pressure of water outlet at one side.JPG

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601355438

Non-compliance

Due 2025-06-09

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Issue title

224 - Isolated occurrence of incorrect/damaged insulation in electricals including burnt/damaged wiring and plugs

Description

No outer cover was equipped for one power switch respectively at production workshop on 1F and 2F of production building B.
工厂B栋1楼和2楼生产车间各有一个电源开关没有外盖。

Description (carried over)

No outer cover was equipped for one eletronic switch at material warehouse on 3F and at finished goods warehouse on 4F respectively of production building B.
工厂B栋生产楼三楼原料仓库和四楼成品仓库各有一个电源开关没有外盖。

Intended corrective and preventative actions, based on root cause analysis

The factory should equip outer covers for all power switches.
工厂应给所有的电源开关设置外盖。

Intended corrective and preventative actions, based on root cause analysis (carried over)

It is recommended that the factory should equip outer covers for all electronic switches.
建议工厂给所有的电源开关设置外盖。

Local law reference

National Safety Technical Code for Electric Equipment (GB 19517-2009)
2.2.3 To prevent accidental contract with live parts, electrical equipment structure and/or housing can be used, or the device can be placed in a closed electrical work field. The parts used to prevent direct contact are only allowed to be removed or opened by means of tools....

Evidence

Status

Closed (2026-08-03)*

Time given to resolve

60 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

[No outer cover was equipped for one power switch..JPG]

[NC No outer cover.JPG]

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

ZAF601355439

Non-compliance

Due 2025-05-10

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.O Implement an appropriate electrical safety program to ensure that electrical hazards are reduced and controlled by appropriately qualified personnel.

Issue title

227 - Unmarked/incorrect labels/signage/instructions for electrics

Description

No warning sign was posted for one power switch respectively at production workshop on 1F and 2F of production building B.
工厂B栋1楼和2楼生产车间各有一个电源开关没有张贴警示标识。

Description (carried over)

No warning sign was posted for one electronic switch on 2F of production building B.
工厂没有给B栋生产楼二楼的一个电源开关张贴警示标识。

Intended corrective and preventative actions, based on root cause analysis

The factory should post warning sign for all power switches.
工厂应给所有的电源开关张贴警示标识。

Status

Closed (2026-08-03)*

Time given to resolve

30 days

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

← Code area 3

Code area 4 →

Intended corrective and preventative actions, based on root cause analysis (carried over)

It is recommended that the factory should post warning sign for all electronic switches.
建议工厂给所有的电源开关张贴警示标识。

Local law reference

General Guide for Safety of Electric User (GB/T 13869-2017)
3.3 Information for use
Provide information on the use of electrical products on nameplates, warnings, safety signs, instructions, etc. This may include although this is not an exhaustive list:
-Production information;
-Expected conditions of use;
-Information on the various stages of the life cycle of safe installation, use, and maintenance;
-Alert information on residual or potential risks.

Evidence

No warning sign was posted for one power switch..JPG

NC No warning sign.JPG

* PDF generated at 03:07 (UTC) on 03 Aug 2026. View this finding on the Sedex platform for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	The company owns or operates worker accommodation (onsite) Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes The 7F of the production building belongs to structural addition and has obtained the relevant completion acceptance. And based on onsite observation, the building was in good condition.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

← Code area 3 Code area 4 →

Does the site have a structural engineer evaluation?	Yes

[← Code area 3] [Code area 4 →]

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and Procedures: The position of the factory is clearly stated in the Child Labour Prevention and Remediation Policy which meets all Workplace Requirements in this code area. The Policy outlines the key mechanisms in place for preventing using child labour and the placement of young workers in dangerous or unhealthy positions. This procedure covers all types of workers including third party employed workers. The Remediation Procedure outlines the procedures and responsibilities for remedying child labour. And the procedure defines actions that will be taken, stakeholders that will be engaged and remediation timeframes. Resources: A senior HR manager is named within the Child Labour Prevention and Remediation Policy as ultimately responsible for ensuring its resourcing, approval and regular review. Training: Training is assigned to training manager. The Child Labour Prevention and Remediation Policy is available and communicated to all workers, all interviewed workers clearly knew the legal age and they all met the legal age when they joined the factory. But some workers didn't know the relevant requirement about young workers. Monitoring: Responsibilities for monitoring implementation of age-verification are defined by the Hiring Procedure. The procedure requires that the age verify is conducted by the HR manager. The factory keeps the copy of ID card of workers and age verification records are consistently maintained.

← Code area 3 Code area 5 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1. 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. 2. 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. 3. Checks of all workers files showed that no child labour or young worker were identified during the audit. The youngest worker in the factory was 18 years old, and who was born on Dec 5, 2007 and entered the factory on Jan 6, 2026. Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour. Evidence examined: Policy on workers recruitment Personnel files including the ID card copies of workers Roster and labour contracts of all workers Worker and management interview

← Code area 3 Code area 5 →

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	6%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	18
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	No

← Code area 4 Code area 5 →

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory's Hourly payroll control procedures policy outlining the systems in place to manage this issue at the site, wage calculation methods are clearly defined, aligning with local labor laws, covering aspects like base pay and overtime. There are strict procedures for payroll processing, with detailed guidelines for timekeeping, deductions, and bonuses. Resources: There is a finance manager responsible for ensuring the implementation of the site policies. Training: All workers have done a series of relevant training on wage policies during onboarding, and regular refresher courses are provided to keep them updated. Multiple communication channels, such as staff meetings, posters, and suggestion box, are used to convey wage - related information. However, based on worker interview, some workers were not clear about the components of wages. Monitoring: Workers report relevant issues to the factory management representative through the appeal mechanism and monitor and implement relevant policies. Additionally, workers feedback regarding wages is closely monitored through informal channels, enabling prompt resolution of any issues that may arise. Social insurance provided for all workers.

← Code area 4

Code area 5.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...		GE ZAF601365959

Systems and evidence examined to validate this code section

Current systems:
1. There were written policies established on wages and benefits and which were communicated to workers during recruitment process.
2. The minimum wage guarantee system was established for all workers. Workers' minimum wages were paid met the local legal requirement, which was RMB2080/month (RMB11.95/hour).(Remark: The local legal minimum wage was RMB2080 per month effective from Mar 1, 2025.)
3. All workers' wages were calculated by hourly rate.
4. All workers were provided with written and understandable information about their employment conditions in respect to wages before they enter employment.
5. All workers' overtime wages were paid 150%, 200% and 300% of the normal wage rate for overtime on weekdays, weekends and statutory holidays respectively.
6. All workers were paid before the end of the following month via bank transfer and each worker was given a pay slip and signed for their wages.
7. The factory provided required social insurance for all employees.

Evidence examined:
- Worker interview
- Management interview
- Local and national laws
- Wages and benefits policy
- Local legal minimum wage documents
- Payroll records
- Leave records
- Payment receipts of social insurance.
- Labour contracts for all employees
- Resignation records
- Payslips of all workers interviewed
- Attendance records to check hourly rates and any overtime premiums

← Code area 4 Code area 5.A →

Findings: good examples

ZAF601365959

Good example

Code area

5 Legal wages are paid

Workplace requirement

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

Description

The factory provided free working meals and accommodation for workers.
工厂为员工提供了免费的工作餐和住宿。

Evidence

The factory provided free working meals and accommodation for workers..JPG

← Code area 5

Code area 5.A →

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages are based on job skills and experience The legal minimum wage Wages meet a living wage
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Only digital payments
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None
Where the site has undertaken a Living Wage gap analysis against a credible Benchmark which Benchmark have they used?	Not Applicable

Worker renumeration

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

Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly
Is actual wage data available on site for any of these options?	Monthly

← Code area 5 Code area 5.A →

Maximum legal working hours	**Max hours per day**	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	**Required hours per day**	8.0
	Required hours per week	40.0
	Required hours per month	184.0
Maximum legal overtime hours	**Max hours per day**	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	**Max hours per day**	2.0
	Max hours per week	10.0
	Max hours per month	36.0
Minimum legal wage	**Min per hour**	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2080.0
Actual minimum wage	**Actual per hour**	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	2080.0

← Code area 5 Code area 5.A →

Minimum legal overtime wage	**Min per hour**	17.93
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	**Actual per hour**	17.93
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable

Wage analysis

Number of workers' records checked	30
Provide the date and details of the records	10 samples from Jan. 2026 (Current month); 10 samples from Aug. 2025 (Random month); 10 samples from May 2025 (Random month).
Are there different legal minimum/ legally recognised CBAs wage grades?	No
For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Meets legal minimum
Indicate the breakdown of workforce per earnings	100% of workforce earning meet the minimum wage.
Are there any bonus schemes used?	Yes Post allowance was provided.

← Code area 5

Code area 5.A →

Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No

← Code area 5
Code area 5.A →

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current system: 1.The factory regularly checks the total wages (including benefits) of workers and compares them with the real and reliable "living guarantee wages" to understand the "living guarantee wage gap" and the proportion of workers who have a gap. The factory formulates a wage improvement plan and pays living security wages to workers within the prescribed time limit. 2.The factory calculated the living wage based on Wage indicator Typical Family Methodology. The assessment covered all workers. The wage records provided by the factory were consistent with the wages in the gap analysis records. The actual wages received by workers are higher than the wages in the gap analysis. Evidence examined: Payroll Minimum wage standard Minimum guaranteed wage Employee interviews Management Interview The survey of the basic needs for workers

← Code area 5

Code area 6 →

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory has formulated written policies and procedures regarding attendance management, overtime regulations, overtime remuneration, production plan, etc. The factory reviews and updates these policies and procedures regularly and posts them on the employees' noticeboard. Resources: Admin manager was responsible for enforcing working hours compliance at the site and this was well defined. Training: The policies regarding on working hours are available and communicated to all workers. And the factory had developed an annual training plan, trained all workers according to the plan and the training records were provided for review. However, some interviewed workers were not very clear about the legal requirement on overtime hours. Monitoring: The factory reviews and updates the policy regularly. Also, the factory assesses the effectiveness of these policies through regular monitoring and internal audits. The max. monthly OT hours were 36 hours.

Summary of findings

← Code area 5.A Code area 7 →

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1.Through employees' interview, overtime is voluntary. 2.According to attendance records and worker interview, basic working hours were 8 hours per day and 40 hours per week. 3.Facial recognition was used to record workers' attendance records. 4.All sampled workers' monthly overtime hours did not exceed 36 hours, the maximum overtime hours of workers were 36 hours. 5.All sampled workers' weekly working hours did not exceed 60 hours, the maximum weekly working hours were 50 hours. 6.All sampled workers enjoyed one day off per seven days, the maximum continuous working days were 6 days. Evidence examined: 1.Worker and management interview 2.Factory policy on working hours 3.Attendance records and payroll records 4.Workers' contracts 5.Warehouse and production records to cross check hours

← Code area 5.A
Code area 7 →

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	NA. It is not allowed under local law.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	50.0
Maximum number of days worked without a day off in sample	6

← Code area 6

Code area 7 →

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory "Social Responsibility Management Manual" outlining the systems in place to manage this issue at the site includes main relevant requirements of the code area, and further detail can be found in the discriminatory risk policy. Documents clearly assigned responsibilities, processes in place and address all code areas, they can be considered robust. Resources: Admin manager was assigned responsibility for implementation and aware of her responsibilities. Training: The manager has received a high level of external training on discriminatory and used the knowledge to develop effective processes in place. Workers were also trained in discrimination. But some interviewed workers were not clear about the detailed requirement, they just said that they had not encountered any cases of discrimination, all requirements were fair for them. Monitoring: Compliance with the process is monitored directly by Admin manager and workshop director and there was follow-up monitoring of whether workers understand discrimination. The plant management system in regulation, implementation and monitoring results conform to the principles of maintaining compliance.

← Code area 6 Code area 8 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1. 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. 2. There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal, and retirement found. 3. There was no evidence of sexual harassment. 4. The management generally knew the requirement of Non-Discrimination. 5. As informed by interviewed workers, most employees spoke highly of the factory management. Evidence examined: Hiring and termination procedure Leave application records Employee handbook. Payroll records Attendance records Termination records Training records

← Code area 6
Code area 8 →

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	6%
Representation of women in managerial roles (ratio of women workers to women managers)	12%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	15%
Three most common nationalities in managerial and supervisory roles	Chinese

← Code area 7

Code area 8 →

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory established procedure and policy to manage this issue at the site including main relevant requirements of the code area, documents clearly assigned responsibilities and processes in place. Resources: System manager was assigned responsibility for implementation and aware of her responsibilities, she could ensure the policy was latest, updated the policy and implemented when needed to meet legal requirement. Training: System manager had enough knowledge of employment, and provided training to workers and relevant key staff, the interviewed workers also confirmed they signed the labor contract and got a copy. But some of them couldn't say the duration of the contract or detailed content in the contract. Monitoring: Compliance with the process is monitored directly by System manager, the subsequent monitoring of this policy was also relatively perfect, it can be considered robust. The plant management system in regulation, implementation and monitoring results conform to the principles of maintaining compliance.

Summary of findings

← Code area 7

Code area 8.A →

Code area	Workplace requirement	Area of NC	Finding
		No findings	

Systems and evidence examined to validate this code section	Current systems: 1. The formal employees at the factory were recruited by the factory directly. 2. No agency worker was used by the factory. 3. No temporary worker, apprenticeship schemes or home worker was identified. 4. All interviewed workers had received a signed labour contract. 5. Workers' personal files were provided for review. Evidence examined: The hiring and termination procedure Personal files Payroll records Labour contracts Worker and management interview

← Code area 7

Code area 8.A →

8. Regular employment is provided

Data points

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

← Code area 8

Code area 8.A →

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

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory's Supplier social responsibility control procedures policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. This includes a comprehensive evaluation of potential subcontractors' qualifications, financial stability, and ethical practices. For homeworkers, the policy is an absolute prohibition. There are procedures in place to ensure that no part of the production process involves home-based work. Resources: System manager was assigned responsibility for implementation and aware of her responsibilities. She has sufficient authority to ensure that all subcontractors comply with social responsibility standards. Training: The factory has established a certain training mechanism, with the management regularly participating in supply chain responsibility seminars and the grassroots workers receiving training on subcontracting management processes. However, the training lacks depth and specificity, and some improvements are still needed. Monitoring: Compliance with the process is monitored directly by System manager the subsequent monitoring of this policy is also relatively perfect, they would never use home worker. No sub-contractor was used by the factory. All documents, contracts and business licenses are available for review. it can be considered robust.

← Code area 8 Code area 9 →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current system: 1. The factory had established policy for sub-contractors. 2. A site tour showed that all production processes were present in the factory. 3. No subcontractor or homeworking was identified in the factory. Evidence Examined: •Worker interview •Management interview. •Site tour •Warehouse in and out records

← Code area 8

Code area 9 →

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

Data points

Are homeworkers employed directly or engaged through an agent?	Not applicable
Gender disaggregated data available	

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?	
Are full records of homeworkers available at the site?	
Does the supplier buy products or services from suppliers that use homeworkers?	No No homeworkers was used by the factory and their suppliers.

Sub-contracting

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

← Code area 8.A

Code area 9 →

Are any sub-contractors used?	No

[← Code area 8.A] [Code area 9 →]

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory's Complaint Procedure outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area, including bullying, harassment, and excessive punishment. The policy also outlines strict disciplinary actions for perpetrators found guilty of such behavior to act as a deterrent. Resources: There is a designated manager responsible for ensuring the implementation of the site policies. Regular training of regular employment guarantee that all the workers and management meets the requisite standards. Training: All workers have done a series of relevant training and verified the effectiveness of the training, such as recognizing different forms of harsh or inhumane treatment, understanding the impact of such behavior on individuals and the workplace, and how to prevent it. Monitoring: The factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audit. And the factory's procedures are updated regularly, relevant documents like internal audit records were also in place. The factory has established a complete mechanism, workers can raise complaints to worker representatives, the manager would review the complaints records and raised action plans.

← Code area 8.A

Code area 10.A →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current systems: 1. 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. 2. The factory had established a policy on Harsh Treatment. Based on workers interview, there was no such negative evidence happened in the past. 3. 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: The relevant policy on prevention of harassment and abuse. Internal grievance procedure documentation Training records Worker and management interview

← Code area 8.A

Code area 10.A →

9. No harsh or inhumane treatment is allowed

Data points

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

← Code area 9 Code area 10.A →

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory's EHS Management Program policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. It includes clear guidelines for waste management, with procedures for sorting, storing, and disposing of different types of waste in an environmentally friendly manner. Procedures for handling environmental incidents are in place, including emergency response plans to quickly address any spills, leaks, or other accidents that could harm the environment. Resources: The plant has appointed a EHS manager who is responsible for ensuring compliance of the module and has received training on the policy and used the knowledge to develop effective processes in the factory. Training: All workers have done a series of relevant training, such as how to properly dispose of waste, and how to identify and report environmental risks. The factory uses posters to keep workers informed about environmental goals, initiatives, and any updates to policies or procedures. But some workers were not clear on the environmental requirements. Monitoring: Adherence to the processes is monitored via departmental reporting to the Production Manager, and the factory conducted regular environmental audits to ensure updating policy and procedures regularly for compliance with regulations.

← Code area 9

Code area 10.B →

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
	No findings		

Systems and evidence examined to validate this code section	Current system: • The factory had conducted environmental impact assessment, all legally required environmental documents were provided for review. • Based on workers interview, they were trained on environmental protection. • The company had policy on environment protection and Mr. Guo Liming/Manager was appointed to response the compliance of environment requirement. Evidence examined: • Environmental policy • Worker and management interview • Site tour • Environmental impact assessment records • EIA report and approval, environmental facilities inspection and acceptance approval • Training records

← Code area 9

Code area 10.B →

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	The factory has not obtained any valid environmental or energy management certificates.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

← Code area 10.A

Code area 10.B →

10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current system: 1.The factory had procedure on environment protection and Mr. Guo Liming/Manager was appointed to response the compliance of environment requirement. 2.The factory learned about the environment impact of their site and took continuously management measures to control the environment impact. 3.Based on workers interview, they were trained on environmental protection. 4.The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations. Evidence examined: • Environmental policy • Worker and management interview • Site tour • Environmental impact assessment records • EIA report and approval, environmental facilities inspection and acceptance approval • Training records

← Code area 10.A

Code area 10.C →

10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Sustainable material sourcing Switching to renewable energy sources
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Not Applicable
Does the site have reduction targets in place to manage climate related risks?	None
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	No
Has the site checked that any 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 The factory checks that the business partners operating on the site hold the appropriate permits and licenses and conduct their business in accordance with the environmental requirements of the facility.

Usage/discharge analysis

	Last full calendar year (2025)	Previous full calendar year (2024)

← Code area 10.B

Code area 10.C →

Total electricity consumption from non-renewable sources (kWh)	645,802	654,605
Total electricity consumption from renewable sources (kWh)	292,395	284,651
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	Data not available	Data not available
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	From water supply company	From water supply company
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	25,329	26,134
Water discharged	Domestic sewage was discharged to municipal sewage network.	Domestic sewage was discharged to municipal sewage network.
Water volume discharged (m3)	20,263	20,907
Water volume recycled (m3)	0	0
Total waste produced (mt)	201,785	224,620
Total hazardous waste produced (mt)	0.6	0.6

← Code area 10.B

Code area 10.C →

Waste to recycling (mt)	139,876	148,620
Waste to landfill (mt)	0	0
Waste to other (mt)	61,909	76,000
Total product produced (mt)	13,000	13,682

← Code area 10.B
Code area 10.C →

10.C. Business ethics

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	Policies and procedures: The factory has established procedures and policies about business ethics, including anti-corruption, anti-bribery, anti-improper competition, fair competition, etc., that's updated according to legal requirement. Resources: The HR Manager is assigned responsibility for implement, review and update the procedures and policies. Training: The factory provides business ethics training to all workers and employees in higher risk positions such as management, finance, purchasing and logistics. The policies and procedures are available and communicated to all workers. However, some interviewed workers didn't know the details about business ethics. Monitoring: The factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Also, the factory conducts regular risk assessment to identify potential ethical business hazards. Based on the internal audit results, there was no negative case.

Summary of findings

← Code area 10.B

Code area	Workplace requirement	Area of NC	Finding
No findings			

Systems and evidence examined to validate this code section	Current systems: 1. 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. 2. The company established a business ethics policy which was communicated to workers through posters and training. 3. The site had received and read the Business Ethics policy of the auditor/audit company. 4. There is an internal grievance process, which is an anonymous email address. Evidence examined: 1.The company business ethics policy 2.Bribery and Corruption policy 3.Training records 4.Worker handbook

← Code area 10.B

10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with business ethics legislation, regulation, consent or permits (within the last three years)?	No
Provide any certified anti-bribery management systems for the site	No certified anti-bribery management systems was available.

← Code area 10.C

Attachments

SMETA-JSASCN26044026-MULTISTEPS PLASTICS (DONG GUAN) CO., LTD.-Mar 25-26, 2026-Annual-Signed CAP.pdf

SMETA-JSASCN26044026-MULTISTEPS PLASTICS (DONG GUAN) CO., LTD.-Mar 25-26, 2026-Annual-Photo Report.pdf