

---

Auditee :	<b>Born Talent Metal (Dong guan) Limited</b>
Audit Date From :	<b>22/07/2019</b>
Audit Date To :	<b>23/07/2019</b>
Expiry Date of the Audit :	<b>Please refer to the producer profile in the amfori BSCI platform</b>
Auditing Company :	<b>SGS</b>
Auditor's Name(s) :	<b>Jevons Qiu(Lead), Joy Fu</b>
Auditing Branch (if applicable) :	<b>SGS CHINA</b>

---



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.  
Access [www.bsciplatform.org](http://www.bsciplatform.org), for entitled users only.

All rights reserved. No part of this publication may be reproduced, translated, stored in a retrieval system, or transmitted, in any form or by any means electronic, mechanical, photocopying, recording or otherwise, be lent, re-sold, hired out or otherwise circulated without the amfori consent.

This is an extract of the amfori BSCI Audit Report, which is available in the amfori BSCI Platform. © amfori, 2018 - The English version is the legally binding One.

**Rating Definitions**



Rating	A combination of ratings per Performance Area where:	Consequence																																							
<p style="text-align: center;"><b>A</b> <b>Very Good</b></p>	<ul style="list-style-type: none"> <li>• Minimum 7 Performance Areas rated A</li> <li>• No Performance Areas rated C, D or E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	B	B	B	A	A	A	A	A	A	A	B	B	B	B	B	B	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
A	A	A	A	A	A	A	A	A	A	A	A	A																													
A	A	A	A	A	A	A	A	A	A	B	B	B																													
A	A	A	A	A	A	A	B	B	B	B	B	B																													
<p style="text-align: center;"><b>B</b> <b>Good</b></p>	<ul style="list-style-type: none"> <li>• Maximum 3 Performance Areas rated C</li> <li>• No Performance Areas rated D or E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td></tr> <tr><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td></tr> </table>	A	A	A	A	A	A	B	B	B	B	B	B	B	A	A	A	A	A	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	C	C	C	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
A	A	A	A	A	A	B	B	B	B	B	B	B																													
A	A	A	A	A	B	B	B	B	B	B	B	C																													
B	B	B	B	B	B	B	B	B	B	C	C	C																													
<p style="text-align: center;"><b>C</b> <b>Acceptable</b></p>	<ul style="list-style-type: none"> <li>• Maximum 2 Performance Areas rated D</li> <li>• No Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td></tr> <tr><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td></tr> </table>	A	A	A	A	A	A	A	A	A	C	C	C	C	A	A	A	A	A	B	B	B	B	C	C	C	D	C	C	C	C	C	C	C	C	C	C	C	D	D	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
A	A	A	A	A	A	A	A	A	C	C	C	C																													
A	A	A	A	A	B	B	B	B	C	C	C	D																													
C	C	C	C	C	C	C	C	C	C	C	D	D																													
<p style="text-align: center;"><b>D</b> <b>Insufficient</b></p>	<ul style="list-style-type: none"> <li>• Maximum 6 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td><td>E</td></tr> <tr><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	D	D	D	A	A	A	B	B	B	C	C	C	D	D	D	E	D	D	D	D	D	D	D	E	E	E	E	E	E	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
A	A	A	A	A	A	A	A	A	A	D	D	D																													
A	A	A	B	B	B	C	C	C	D	D	D	E																													
D	D	D	D	D	D	D	E	E	E	E	E	E																													
<p style="text-align: center;"><b>E</b> <b>Unacceptable</b></p>	<ul style="list-style-type: none"> <li>• Minimum 7 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>A</td><td>A</td><td>B</td><td>B</td><td>C</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	E	E	E	E	E	E	E	A	A	B	B	C	D	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	<p>amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.</p>
A	A	A	A	A	A	E	E	E	E	E	E	E																													
A	A	B	B	C	D	E	E	E	E	E	E	E																													
E	E	E	E	E	E	E	E	E	E	E	E	E																													
<p style="text-align: center;"><b>Zero Tolerance</b></p>	<p>A Zero Tolerance issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)</p>	<p>Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.</p>																																							

**Main Auditee Information**



Name of producer :	<b>Born Talent Metal (Dong guan) Limited</b>		
DBID number :	<b>392844</b>		
Audit ID :	<b>157751</b>		
Address :	<b>No,70, Huan Cun WEST Road, Jinxia Hexi Industrial Zone, Chang'an, Dongguan</b>		
Province :	<b>Guangdong</b>	Country :	<b>China</b>
Management Representative :	<b>Zhen Hu</b>		
Contact person:	<b>Zhen Hu</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Accessories</b>	Product group :	<b>other accessories (please specify)</b>
Product Type :	<b>Manufacture of steel watch cases</b>		

**Audit Details**



Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 23/07/2020	

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

Executive summary of audit report
<p>1. Business license No.: 914419005723757484 valid from 19 April 2011 to long term.</p> <p>2. The factory rent One 3-floor production building and one flat production building as office and production site. It covered about 10138 SQM.</p> <p>3. The management allowed auditors to visit and take photos for all areas of the factory, review production records, all attendance records and payroll records. Workers interview were conducted in confidential and independent place without any interference. all interviewees were cooperated with auditor. Normally they were satisfied with the factory.</p> <p>4. There were 10 subcontracted employees from canteen and security guard service provider.</p> <p>Remark:</p> <p>1. The factory does not apply for working hours waiver so that documented valid authorization to make exemptions of working hours is not applicable.</p> <p>2. The audit was conducted by Leader auditor Jevons Qiu (RA21702037) and Member auditor Joy Fu (RA21701892).</p>

**Ratings Summary**



<b>Auditee's background information</b>			
Auditee's name :	<b>Born Talent Metal (Dong guan) Limited</b>	Legal status :	<b>Ltd Company</b>
Local Name :	<b>東莞生才五金有限公司 (914419005723757484)</b>	Year in which the auditee was founded :	<b>2011</b>
Address :	<b>No,70, Huan Cun WEST Road, Jinxia Hexi Industrial Zone, Chang'an,</b>	Contact person (please select) :	<b>Zhen Hu</b>
Province :	<b>Guangdong</b>	Contact's Email :	<b>zhen.hu@born-talent.com</b>
City :	<b>Dongguan</b>	Auditee's official language(s) for written communications :	<b>Mandarin</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>Cantonese</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>www.born-talent.com/en/index.html</b>
GPS coordinates :	<b>22.792850,113.799730</b>	Total turnover (in Euros) :	<b>25000000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>100.00</b>
Industry :	<b>Accessories</b>	Of which domestic market % :	<b>0.00</b>
If other, please specify :		Production volume :	<b>1500000 pcs per year</b>
Product Group :	<b>other accessories (please specify)</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :		Lost time injury calculation cost :	<b>No</b>
Product Type :	<b>Manufacture of steel watch cases</b>		

<b>Auditee's employment structure at the time of the audit</b>			
Total number of workers :	<b>341</b>	Total number of workers in the production unit to be monitored (if applicable) :	<b>0</b>
	<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>	
Permanent workers	<b>189</b>	<b>152</b>	
Temporary workers	<b>0</b>	<b>0</b>	
In management positions	<b>11</b>	<b>9</b>	
Apprentices	<b>0</b>	<b>0</b>	
On probation	<b>14</b>	<b>13</b>	
With disabilities	<b>0</b>	<b>0</b>	
Migrants (national citizens)	<b>160</b>	<b>112</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>0</b>	<b>0</b>	
Production based workers	<b>112</b>	<b>73</b>	
With shifts at night	<b>25</b>	<b>6</b>	
Unionised	<b>189</b>	<b>152</b>	
Pregnant	<b>-</b>	<b>0</b>	
On maternity leave	<b>-</b>	<b>0</b>	

**Finding Report**



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

Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: D

Deadline date:20/07/2020

**GOOD PRACTICES:**

Nil

**AREAS OF IMPROVEMENT:**

Consolidated finding: The overall observation shows the auditee partially fulfils the requirement of performance area 1. The factory set up amfori BSCI policy and procedure. For example, the procedures on hiring, working hours, wages and benefits, subcontracting, dealing with grievances, training workers, promoting ethical behaviour, etc were established by the factory. The factory established completed amfori BSCI management system including plan-do-check action-cycle, and conducted internal audit and management review on amfori BSCI management system. HUANG Huaying / admin manager was amfori BSCI representative and took whole charge of amfori BSCI affairs in the factory. Based on interview with him and document review, he had sufficient power and competence to implement amfori BSCI management system. The factory signed amfori BSCI COC commitments and assessed social performances for most of its significant business partners based on the amfori BSCI requirement. Moreover, the factory had calculated production capacity and provided production scheduling for review. However, gaps had been identified in implementation:

综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。工厂建立了amfori BSCI社会责任政策和程序, 例如程序中包括招聘, 工作时间, 工资福利, 分包, 申诉系统, 员工培训, 反腐败等内容。工厂已建立完整的amfori BSCI管理系统, 其中也包括计划-执行-检查-改善循环, 并进行了相应的内审和管理评审来监督amfori BSCI管理体系的运行。黄华英/行政经理被工厂指定为amfori BSCI负责人, 统筹整个工厂的amfori BSCI事务。根据其访问及文件审查, 其有足够的权限来推行amfori BSCI系统并有足够能力来实施amfori BSCI管理系统。工厂和他的大多数关键商业伙伴根据amfori BSCI要求签署了amfori BSCI行为守则承诺书并评估了社会责任绩效。此外, 工厂有做产能计算, 并提供产能规划记录。但也发现工厂执行上有差距:

- 1.1 - The main auditee partially respected this principle because some defects of the amforiBSCI management system effectiveness were found during the audit, such as: 1) The occupational health and safety finding on risk assessment, PPE management and chemical management, etc. 2) The workforce capacity evaluation did not focus on legal requirement so that the workers' overtime exceeded legal requirement systematically. 工厂未完全遵守该原则, 因为审核中发现了一些amforiBSCI管理有效性的问题, 例如: 1) 风险评估、劳保用品管理、化学品管理等方面的职业健康安全方面的问题点。2) 工厂的产能评估时没有关注工作时间的法律符合性导致加班时间系统性超出法律要求。
- 1.3 - The auditee partially respected this principle because the factory had established procedure on suppliers and subcontractors' management. And the factory subcontracted cleaning service and security service to two companies, but the factory neither collect COC commitment from these subcontractors nor keep attendance records and payroll records of the security guards and cleaners. 工厂未完全遵守该原则, 因为工厂已经建立了供应商及分包商的管理程序。工厂分包了保安和清洁服务, 但是工厂没有收集这两家公司的社会责任承诺, 也没有收集保安和清洁工的工作时间记录及工资记录。
- 1.4 - The main auditee partially respected this principle because the factory evaluated cost and workforce capacity, but the workforce capacity evaluation did not focus on legal requirement. 工厂未完全遵守该原则, 因为工厂评估了生产成本和产能, 但工厂的产能评估是没有关注工作时间的法律符合性。

**Remarks from Auditee:**

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

Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A

Deadline date:20/07/2020

**GOOD PRACTICES:**

Nil

**AREAS OF IMPROVEMENT:**

Consolidated finding: The overall observation showed the auditee partially fulfilled the requirement of performance area 2. There was one trade union in the factory and there were freely elected trade union representatives. The union representatives had meeting with the management per season. The factory set long term goals to protect workers. According to interview statement with worker representative and workers, they were familiar with workplace-related issues, their labor right e.g. the law, work contracts, job description, working rules. The factory also provided on-board training on workers' right to workers. The auditee had a grievance mechanism: the mechanism consisted of worker representative and an open-door policy on coming up with suggestion directly to workers' supervisor. However, gaps had been identified in implementation:

综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。公司成立了工会, 并且由员工选举了工会代表。工会代表每季度和管理层开会。工厂设置了保护工人的长期目标。根据员工代表及员工的访谈信息, 员工代表以及员工都很清楚工厂场所相关信息, 以及员工的劳工权利, 例如劳动法, 劳动合同, 工作描述以及厂纪厂规等。工会给员工提供关于员工权利的入职培训。工厂已建立了申诉系统, 员工可通过员工代表或直接向主管进行沟通等方式提供投诉。但也发现工厂执行上有差距:

- 2.2 - The main auditee partially respected this principle because the factory set long term goals to protect workers according to the amforiBSCI Code of Conduct, but it did not collect evidences of year 2018 and 2019 to indicate the compliance status. 工厂未完全遵守该原则, 因为工厂根据amforiBSCI行为守则设置了长期目标, 但是工厂没有收集2018年和2019年的符合证据以显示符合状态。

**Remarks from Auditee:**

<b>Performance Area 3 : The rights of Freedom of Association and Collective Bargaining</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> Consolidated finding: The overall observation shows the auditee fulfilled the requirement of performance area 3. There was one trade union in the factory and there were freely elected trade union representatives. No collective bargain agreement was concluded between the factory and workers, but the factory did not prevent workers from bargaining for the agreement. Based on statement of worker representative, he was not discriminated by the factory. He had access to workers and workplace freely. 综合概况: 整体观察显示被审核方符合该绩效区域的要求。公司成立了工会, 并且由员工选举了工会代表。工厂和员工无集体谈判协议, 但工厂也未阻止员工有意愿的时候和工厂谈判。根据员工代表的访谈员工代表不会被歧视, 他可以随时进入车间和员工沟通。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 4 : No Discrimination</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> Consolidated finding: The overall observation showed the auditee partially fulfilled the requirement of performance area 4. The factory made one policy on anti-discrimination. The policy defined that the factory would not discriminate workers by race, gender and ages etc. According to statement with workers, workers could use the grievance system through telling worker representatives once workers' right was infringed. The policy on discipline measures made by the factory was in line with legal and amfori BSCI requirement. However, gaps had been identified in implementation: 综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。工厂制定了反歧视的政策, 反歧视政策中表明工厂不会因为种族, 性别, 年龄等原因对员工区别对待。并且依照员工访谈, 若员工的权利受到任何侵害, 员工可以通过员工代表反馈的形式进行投诉。通过查看工厂的惩戒措施程序, 其描述的措施均符合法规和amfori BSCI要求。但也发现工厂执行上有差距:	
<b>Remarks from Auditee:</b>	
<b>Performance Area 5 : Fair Remuneration</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: B	Deadline date: 20/07/2020
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> Consolidated finding: The overall observation shows the auditee partially fulfilled the requirement of performance area 5. The factory set up wages and benefit paying system, which included paid statutory holidays, sick leave, annual leave, marriage leave and maternity leave, etc. Based on the wages from June 2018 to May 2019, the minimum wage was RMB 1510 per month before Jul. 2018 and RMB1720 since Jul. 2018, which met the legal requirement. . What's more, the factory paid position allowance for workers. Social insurance and wage tax deductions were identified according to wage records of workers. All these processes and evidences were cross checked by document review, worker interview and management interview. The factory provided skill training to workers and workers' position allowance will be increased accordingly when workers received more training. However, gaps had been identified in implementation: 综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。工厂制定了工资支付政策和福利政策, 福利政策包括给员工提供法定节假日, 病假, 年假, 婚假, 产假等假期。根据工厂提供的2018年6月至2019年5月的工资记录显示, 工厂给员工支付的最低工资2018年7月前是1510元/月, 2018年7月开始是1720元/月, 符合法规要求, 并且员工有岗位津贴。根据员工的工资记录, 员工工资有社保和个税扣款。同时, 工厂给员工提供了相应的技能培训, 若员工的技能提升, 岗位津贴将相应提高。工厂为所有员工提供了社会保险。以上过程均用文件, 访谈等方式进行核实过。但也发现工厂执行上有差距:	
5.5 - The main auditee did not respect this principle because the factory only provided paid annual leave based on the working length in this factory, instead of grand total working length. The factory claimed they did not collect the grand total working length of workers. 工厂未遵守该原则, 因为工厂仅按照本厂工作年限提供带薪年假, 而不是累计工作年限。工厂表示没有收集工人累计工作年限数据。	
<b>Remarks from Auditee:</b>	

**Performance Area 6 : Decent Working Hours**

Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: D

Deadline date:20/07/2020

**GOOD PRACTICES:**

Nil

**AREAS OF IMPROVEMENT:**

Consolidated finding: The overall observation shows the auditee partially fulfilled the requirement of performance area 6. The factory made a policy of working hour system and controlled working hours. The factory records attendance data through fingerprinting attendance system. According to the policy and implementation records, all employees worked 8 hours per day and 5 days per week. Most of employees worked in day shift (8:30~12:30, 14:00~18:00). Part of machining employees worked as two shifts (shift 1: 8:30~17:30, shift 2: 21:30~6:00). Security guards worked as three shifts (shift 1: 8:00~16:00, shift 2: 16:00~24:00, shift 3: 0:00~8:00). The factory arranged workers to work overtime sometimes and workers had right to choose working overtime or not. Workers can take a rest during the work time when they felt tired. The factory paid its workers 150% and 200% of normal wages as overtime wages on weekday and weekend. All this processes and implementation can be verified by interview and document review. However, gaps of overtime had been identified in implementation:

综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。工厂制定了工时政策并控制工作时间。工厂通过指纹考勤机记录考勤。依照政策以及工厂实际的执行情况, 所有工人每周工作5天, 每天8小时, 多数员工长白班(8:30~12:30, 14:00~18:00), 部分机加工员工两班工作(班次一: 8:30~17:30, 班次二: 21:30~6:00), 保安三班工作(班次一: 8:00~16:00, 班次二: 16:00~24:00, 班次三: 0:00~8:00)。工厂会依据生产订单安排员工进行加班, 员工可自愿选择是否加班。并且员工在车间如果觉得疲惫, 可自由选择休息几分钟。工厂支付150%和200%的平时工资作为平时和周末的加班工资。以上均已从员工访谈以及文件信息等方面进行核实。但也发现工厂执行上有差距:

- 6.2 - The main auditee did not respect this principle because the monthly OT hours exceeded legal requirement. All sampled employees' monthly OT hours exceeded 36 hours; the maximum was 82 hours in Dec. 2018 and Mar. 2019.  
工厂未遵守该原则, 因为员工月加班超过法规要求。所有抽样的员工的月加班超过法规要求的36小时, 最大是2018年12月和2019年3月为82小时。

**Remarks from Auditee:**



**Performance Area 7 : Occupational Health and Safety**

Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A

Deadline date:20/07/2020

**GOOD PRACTICES:**

Nil

**AREAS OF IMPROVEMENT:**

7.23 N/A, The factory did not provide transportation to workers. Consolidated finding: The overall observation showed the auditee partially fulfilled the requirement. The committee of health and safety was set up. And LUO Jiantian was responsible for the affairs of health and safety. For fire safety, the factory ensured adequate fire hydrants, extinguishers and fire alarms. All fire safety facilities were checked by safety specialist per month. Hydrant, emergency light and fire alarm were effective during the testing. For mechanism safety, all processes of operation safety procedure were set up; workers were well trained to operate it correctly. The factory obtained MSDS of all chemicals and set up leaking proof facilities for all chemicals. According to worker statement, worker understood well of the risk of mechanism. The factory also set up emergency procedure and trained adequate first aider. The first aid box was also available in every workshop. Clean potable water was also provided. The factory cleaned the water heating facilities periodically to ensure hygienic. The factory provided canteen and dormitory. And the canteen and dormitory were in good condition. However, gaps had been identified in implementation as follows:

7.23 不适用, 工厂没有为工人提供工作交通。综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。工厂创建了健康安全委员会, 由螺旋甜负责整体的健康与安全。在消防安全方面, 工厂给所有车间足够消防栓, 消防警铃和灭火器等, 并且安全专员每月都会检查。审核时测试, 消防栓、应急灯和消防警铃都是有效的。在机械安全方面, 工厂制定了所有工序的安全操作规程, 并且给员工提供了培训以防范安全的风险。工厂保存了所有化学品的MSDS, 并且给所有化学品提供了防渗漏设施。通过访谈车间的员工, 员工很了解岗位的机械安全。工厂制定了急救政策, 工厂给每个车间配备了药箱, 而且工厂内有足够急救员。工厂也提供了饮用水给员工, 且工厂定期清洗饮用水加热设施保证安全卫生。工厂提供了食堂和宿舍。食堂和宿舍情况良好。但也发现工厂执行上有差距:

- 7.1 - The main auditee partially respected this principle because the management representative responsible for health and safety was not familiar with the legal and amforiBSCI requirement on health and safety, and lead to some issues were raised in health and safety section, such as: risk assessment, PPE management and chemical management, etc.  
工厂未完全遵守该原则, 因为健康安全管理者代表不了解法规和amforiBSCI对健康安全的要求, 导致健康安全方面出现问题, 例如: 风险评估、劳保用品管理、化学品管理等。
- 7.3 - The main auditee partially respected this principle because the factory carried out one simple risk assessment for safe, healthy and hygienic working conditions which was not covered detail equipment/machine operation/activity, occupational hazards.  
工厂未完全遵守该原则, 因为工厂进行了一个简单的健康安全风险评估, 这个评估没有覆盖具体的具体的设备/机器的操作/活动。
- 7.6 - The main auditee partially respected this principle because the factory provided 2 kinds of mask to proof dust. But 1 out of them was not in line with industrial standard.  
工厂未完全遵守该原则, 因为工厂提供了2种口罩用于防尘, 其中1种不符合工业要求。
- 7.7 - The main auditee partially respected this principle because 1) Scouring oil were marked with toxic, but it should be labelled as inflammable as per MSDS. 2) The factory did not obtain accurate MSDS for some chemicals, such as the MSDS of scouring oil consisted of wrong harmful component information.  
工厂未完全遵守该原则, 因为1) 亚司通标识了有毒标识, 但根据MSDS应该使用易燃标志。2) 工厂没有获得部分化学品准确的物料安全数据表, 比如亚司通的物料安全数据表有害成分错误。
- 7.11 - The main auditee partially respected this principle because one guardrail for windows at 3F of production building was broken, and the factory did not maintain it in time.  
工厂未完全遵守该原则, 因为3楼一个窗户护栏破损, 工厂没有及时维修。
- 7.16 - The main auditee partially respected this principle because all escape plans did not point out emergency assembly point and fire alarm.  
工厂未完全遵守该原则, 因为所有疏散平面图没有指出紧急集合点和警铃。
- 7.25 - The main auditee partially respected this principle because based on occupational hazard factor assessment report which was issued in May 2019, 3 out of 17 noise test points exceed exposure limit.  
工厂未完全遵守该原则, 因为根据2019年5月职业危害因素监测报告, 17个噪音测试点中3个超过接触限值。

**Remarks from Auditee:**

**Performance Area 8 : No Child Labour**

Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A

Deadline date:

**GOOD PRACTICES:**

Nil

**AREAS OF IMPROVEMENT:**

Consolidated finding: The overall observation showed the auditee fulfilled the requirement of performance area 8. The policy of recruiting was set up by the factory. It stipulated the factory refused to recruit the worker whose age below 16 years old. The factory had established procedure on crossing check workers' age. And the recruitment specialists had been trained and well known how to cross check workers' age when workers' age is doubtful. The factory established remediation measure of child labor in order to set up measure of recruiting child labor incidentally. After checking all personnel files of workers, no child labor was identified in the factory.

综合概况: 整体观察显示被审核方符合该绩效区域的要求。工厂制定了合适的招聘政策, 规定工厂不招聘16岁以下的工人。工厂已经建立年龄核实体系, 并且招聘专员获得培训并了解如何交叉审核可疑的员工年龄。工厂制定了童工补救措施以防万一发现童工的应对措施。在审核过程中, 通过查阅所有员工的人事资料, 未发现有任何童工存在。

**Remarks from Auditee:**

<b>Performance Area 9 : Special protection for young workers</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:20/07/2020
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> <p>Consolidated finding: The overall observation showed the auditee partially fulfilled the requirement of performance area 9. The policy of young worker protection was made by the factory. The factory understood the legal requirement of young workers according to interview with management. No young workers were identified in the factory. However, gaps had been identified in implementation:                      综合概况:整体观察显示被审核方符合该绩效区域的要求。工厂制定了未成年工的保护政策,工厂了解如何依照法规要求保护未成年工。在审核过程中,未发现未成年工的存在。但也发现工厂执行上有差距:</p> <p>9.1 - The main auditee partially respected this principle because the factory conducted one simple risk assessment for young worker protection, but the assessment did not cover some key processes, such as assembly and packing.                      工厂未完全遵守该原则,因为工进行了一个简单的未成年工保护风险评估,但风险评估记录没有包含部分管关键工序,如装配和包装。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 10 : No Precarious Employment</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> <p>Consolidated finding: The overall observation showed the auditee fulfilled the requirement of performance area 10. Labor contracts were all concluded between the factory and workers. The contracts statement included the description of working hours, training, rest time and leave, compensation, occupational hazard notification, etc. The factory provided a copy of contract to every worker. Based on interview statement of workers, workers understood well of the content of labor contract. No illegal employment was identified during the audit.                      综合概况:整体观察显示被审核方符合该绩效区域的要求。工厂和每个员工均签订了劳动合同,劳动合同的内容包括工时,培训,休息时间和假期,报酬和支付条件、职业危害告知等。工厂提供了一份劳动合同副本给员工。通过员工访谈,员工均了解劳动合同内容。审核过程中,工厂无不符合法规的用工形式存在。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> <p>Consolidated finding: The overall observation shows the auditee fulfilled the requirement of performance area 11. The factory established the procedure on anti-forced labor. The discipline policy was also in line with legal requirement. According to onsite observation and statement of workers and management, workers confirmed that there was no evidence of forced labor showed in the factory, for example, they could resign according to legal requirement and they could leave the factory freely without being searched. No inhumane or degrading treatment was found during the audit and according to interview with workers.                      综合概况:整体观察显示被审核方符合该绩效区域的要求。工厂制定了反强迫劳动的程序,工厂的惩戒政策也是符合法律法规要求。依据现场观察和管理层、员工访谈,员工也很清晰地表明工厂内无强迫劳动的现象,例如员工可以依照法规要求提出辞工而不会被克扣工资,并且可以自由离开工厂。员工也未遇到任何被侮辱或非人道的待遇。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> <p>Consolidated finding: The overall observation showed the auditee fulfilled the requirement of performance area 12. The factory had established procedures on Protection of Environment. The water used by the factory came from municipal water. The factory had established procedure on Energy and Water Saving procedure and kept statistic logs of water consumption. The factory obtained Pollution Discharge Permit. Based on observation and permit, the main pollutions were industrial/domestic sewage, waste gas and solid waste. The factory transferred hazardous waste to license hazardous waste treatment agency. The factory conducted pollution discharged monitoring test periodically to ensure its pollution discharge in line with legal requirement.</p> <p>综合概况: 整体观察显示被审核方符合该绩效区域的要求。工厂建立了环境保护的程序。工厂主要使用当地市政提供的自来水。工厂建立了节约能源和水资源的程序并保留了水资源消耗统计记录。工厂获得了排污许可证。根据现场观察和许可证, 主要污染是工业/生活废水、废气、噪声和固体废弃物。工厂将所有的危险废弃物转移给了有资质的危废处理商。工厂定期监控污染物的排放确保排放符合法律要求。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - 157751] Audit Date: 22/07/2019 PA Score: A	Deadline date:20/07/2020
<b>GOOD PRACTICES:</b> Nil	
<b>AREAS OF IMPROVEMENT:</b> <p>Consolidated finding: The overall observation showed the auditee partially fulfilled the requirement of performance area 13. The policy on anti-corruption was established. All workers were provided anti-corruption training. The factory conducted risk assessment about Ethical Business. No misrepresentation was provided by the factory and all information could be cross checked. However, gaps had been identified in implementation:</p> <p>综合概况: 整体观察显示被审核方部分符合该绩效区域的要求。公司创建了反腐败的政策。所有工人被提供了反腐败的培训。工厂进行了道德的商业行为的风险评估。审核过程中, 公司提供的数据也均可通过其它方面进行核实, 公司未提供任何不实信息。审核时也未发现有任何泄密的负面现象。但也发现工厂执行上有差距:</p> <p>13.1 - The main auditee partially respected this principle because the factory conducted risk assessment on corruption, but the prevention measures of all risks were the same, such as setting supervisory phone and conduct joint meeting, etc. 工厂未完全遵守该原则, 因为工厂做了廉政风险评估, 但所有风险的预防措施都是相同的, 例如设置监督电话和设置联席会议等。</p>	
<b>Remarks from Auditee:</b>	

**Summary**



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	22/07/2019	157751	D	A	A	A	B	D	A	A	A	A	A	A	A	C

**Producer Photos**



External photo(s) of the production unit(s)  
Factory gate.JPG



Photo of fire safety equipment  
Test emergency light.JPG



Photo of the inside of the main production hall  
Drilling.JPG



External photo(s) of the production unit(s)  
Factory name.JPG



Photo of fire safety equipment  
Test fire alarm.JPG



Photo of the inside of the main production hall  
Electricity box with warning sign.JPG



External photo(s) of the production unit(s)  
Housing number.JPG

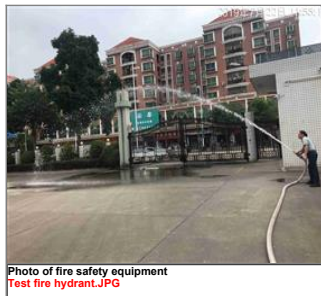


Photo of fire safety equipment  
Test fire hydrant.JPG



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



External photo(s) of the production unit(s)  
Production building.JPG



Photo of non-conformity  
NC-Escape plan did not point out emergency assembly point and fire alarm.JPG



Photo of the inside of the main production hall  
Material warehouse.JPG



Photo first aid facilities  
Eye washing facility.JPG



Photo of non-conformity  
NC-One guardrail for windows at 3F of production building was broken.JPG



Photo of the inside of the main production hall  
Occupational hazard factor notification card was posted.JPG



Photo first aid facilities  
First aid kit.JPG



Photo of non-conformity  
NC-The dust proof mask was not in line with industrial standard.JPG



Photo of the inside of the main production hall  
Packing material warehouse.JPG



Photo of chemical storage room (if applicable)  
Chemicals warehouse.JPG



Photo of non-conformity  
NC-The monthly overtime hours exceeded legal requirement.JPG



Photo of the inside of the main production hall  
Polishing.JPG



Photo of chemical storage room (if applicable)  
Chemicals with safety label.JPG



Photo of non-conformity  
NC-Wrong pictograph for chemical.JPG



Photo of the inside of the main production hall  
Suggestion box and attendance recorder.JPG



Photo of chemical storage room (if applicable)  
Chemicals with secondary containment.JPG



Photo of the code of conduct on display  
amfori BSCI Code was displayed.JPG



Photo of the inside of the main production hall  
Washing.JPG



Photo of chemical storage room (if applicable)  
MSDS in chemicals warehouse.JPG



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



Photo of the personal protection equipments (if applicable)  
Polishing worker wore earplugs and masks.JPG



Photo of fire safety equipment  
Emergency exit of workshop.JPG



Photo of the inside of the main production hall  
Auto polishing.JPG



Photo of the personal protection equipments (if applicable)  
PPE signs.JPG



Photo of fire safety equipment  
Emergency sign and evacuation light.JPG



Photo of the inside of the main production hall  
CNC 2.JPG



Photo of the sanitary facilities  
Drinking water.JPG



Photo of fire safety equipment  
Fire facilities at production building.JPG



Photo of the inside of the main production hall  
CNC.JPG



Photo of the sanitary facilities  
Toilet.JPG