Sedex Members Ethical Trade Audit (SMETA) Report

(Version 4 May 2012, 2/4 Pillar Audit; replaces version 2.4. Sept 2010)

Supplier name:		
Site country:	China	
Site name:	Honor handbag company limited	
SMETA Audit Type:		4-Pillar

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health and Safety Business Practices and Environment. The SMETA Best Practice Methodology v.4.0 May 2012 was applied. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA Declaration.
- (2) The audit scope was against the following reference documents: Please check appropriate SMETA Audit Type in the above box: 2-Pillar SMETA Audit
 - ETI Base Code
 - SMETA Additions
 - o Management systems and code implementation,
 - o Entitlement to Work & Immigration.
 - Sub-Contracting and Home working

4-Pillar SMETA Audit

- o 2-Pillar requirements plus
- o Additional Pillar assessment of Environment
- Additional Pillar assessment of Business Practices

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







Audit Comp	any Name:	Report Owner (payee):		
Bureau	Veritas			
Sedex Company Reference: (to be completed if report is to be up		S Not provided		
Sedex Site Reference: (to be completed if report is to be up	ploaded to Sedex):	P Not provided		
	Audit Con	ducted By		
Commercial	\boxtimes	Purchaser		
NGO		Retailer		
Trade Union		Brand Owner		
Multi-stakeholder		Combined Audit (select all that apply)		
Auditor Reference Number: (If applicable)		N/A		

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA best practice guidance.

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

Auditor Name(s) (please list all including all interviewers): Eric Yang

Role: Auditor

Date: March 21. 2014

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Audit Details

Audit Details			
A: Report #:	10140510082		
B: Date of audit:	March 21, 2014		
C: Time in and time out:	Time in:9:50 Time out:17:00		
D: Number of Auditor Days Used: (number of auditor x number of days)	1 auditor x 1 day		
E: Audit type:	 ☐ Full Initial ☐ Periodic ☐ Full Follow-up ☐ Partial Follow-Up ☐ Partial Other - Define 		
F: Was the audit announced?	☑ Announced☐ Semi – announced☐ Unannounced		
G: Was the Sedex SAQ available for review?	☐ Yes ☐ No If no, why not?: The factory had not finished the SAQ yet		
I: Auditor name(s) and role(s):	Eric Yang/Auditor		
J: Report written by:	Eric Yang		
K: Report reviewed by:	Scarlett Ke		
L: Report issue date:	March 24, 2014		
M: Supplier name:	N/A		
N: Site name:	Honor handbag company limited		
O: Site country:	China		
P: Site contact and job title:	Manager		
Q: Site address:	Nan She Industrial area, Cha Shan Town, Dongguan City, Guangdong province.		
Site phone:	86-769-86183186		
Site fax:	86-769-81927780		
Site e-mail:	sally@honesthandbags.com		
R: Applicable business and other legally required licence numbers:	Business License Number: 441900001509041		



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for example, business license no, and liability insurance					
S: Products/Activities at site, for example, garment manufacture, electricals, toys, grower	Handbag				
T: Audit results reviewed with site management?	Yes				
U: Who signed and agreed CAPR (Name and job title)	Ms. Sally Huang, Manager				
V: Did the person who signed the CAPR have authority to implement changes?	Yes				
W: Previous audit date:	N/A				
X: Previous audit type:		SMETA 2-pillar	SMETA 4-pillar	Other	
	Full Initial				
	Periodic				
	Periodic Full Follow-Up Audit				
	Full Follow-Up				
	Full Follow-Up Audit Partial Follow-				



Audit Scope

Local Law (Please state legal requirement)		
A: Standard work week: (total hours excluding overtime)	8 hours a day and 40 hours a week	
B: Maximum allowed overtime hours: (please state per day, week, month)	3 hours a day and 36 hours a month	
C: Minimum work age:	Above 16 years for restricted work and above 18 for unrestricted work	
D: Minimum legal wage for standard hours: (please state per day, week, month)	RMB 1100 per month or RMB 6.32 per hour before May 1, 2013 RMB 1310 per month or RMB 7.53 per hour since May 1, 2013	
E: Minimum legal overtime wage: (please state per day, week, month)	No less than 150% of normal wage for overtime on weekdays, No less than 200% of normal wage for overtime on rest days, No less than 300% of normal wage for overtime on statutory holidays	

Audit Scope (Please select the code and additional requirements that were audited against during this audit)		
(1 loade coloct the code and additional require	The that were addition against during the addity	
2-Pillar Audit		
10B4: Environment 4-Pillar		
10C: Business Practices 4-Pillar		

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

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



Non-Compliance Table

logue			of Non-Confor	Record the number of issues by line*:			
	Issue		Local Law	Additional Elements	NC	Obs	GE
0	Management systems and code implementation				0	0	0
1	Employment Freely Chosen				0	0	0
2	Freedom of Association				0	0	0
3	Safety and Hygienic Conditions	\boxtimes	\boxtimes		4	0	0
4	Child Labour				0	0	0
5	Wages and Benefits	\boxtimes	\boxtimes		1	0	0
6	Working Hours				0	0	0
7	Discrimination				0	0	0
8	Regular Employment				0	0	0
8A	Sub-Contracting and Homeworking				0	0	0
9	Harsh or Inhumane Treatment				0	0	0
10A	Entitlement to Work				0	0	0
10B2	Environment 2-Pillar				0	0	0
10B4	Environment 4-Pillar				N/A	N/A	N/A
10C	Business Practices 4-Pillar					N/A	N/A

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



Audit Overview

Audit Overview											
				M	anagement		Worker Re	epresentati	ves		
Audit attendan	се			S	enior mana	gement	Worker C	Committee tatives	Unic	Union representatives	
A: Present at the	ne openir	ng me	eeting?		Yes	□No	⊠ Yes	□ N	No 🗆 Y	'es	⊠ No
B: Present at the	ne audit?	•			Yes	□No	☐ Yes	⊠ N	√0	'es	⊠ No
C: Present at the	ne closin	g mee	eting?		Yes	□No		□ N	√0	'es	⊠ No
D: If Worker Replease explain			not prese	ent N	/A						
E: If Union Representatives not present please explain reasons why:			t T	here was no	union in	the factory	1				
F: Site description: (Include size, location and age of site. Also include structure and number of buildings)			T th w e s J	The factory was located at Nan She Industrial area, Cha Shan Town, Dongguan City, Guangdong province, China, The audited factory was consisted of the 2 nd floor, 3 rd floor and half of the 1 st floor of one 3-storey production building, one 1-storey warehouse building, No dormitory and canteen was provided to the employees. Total construction area occupied by the factory was 1500 square meters. The factory had operated on the site for 1 year (since January 22, 2013) On the audit day, there were 41 employees (with 17 females and 24 males) including 33 production workers present and 10 of them were interviewed.							
G: Site function:				☐ Agent ☐ Factory Processing/Manufacturer ☐ Finished Product Supplier ☐ Grower ☐ Homeworker ☐ Labour Provider ☐ Pack House ☐ Primary Producer ☐ Service Provider ☐ Sub-Contractor							
H: Month(s) of peak season: (if applicable)			N	Not obvious							
I: Typical production level as a % of the total capacity by month (record below): Site declaration only – this has not been verified by auditor.											
Jan Feb	Mai	r	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec



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60%	60%	60%	60%	60%	60%	60%	60%	60%	60%	60%	60%

J: Process overview:

(Include products being produced, main operations, number of production lines, main equipment used)

The factory specialized in the manufacture of mirror cabinet. Main production activities included cutting, sewing, finishing and packing. There were 2 production lines in the factory. The main equipments used in the factory include: Packing machine: 1 set, sewing machines: 4 sets, DY sewing machine: 30 sets. 6 high speed sewing machine, Cutting machines: 1 set,

K: Attitude of workers:

(Include their attitude to management, workplace and the interview process. Both positive and negative information should be included) Note: Do not document any information that could put workers at risk

Total 10 employees were randomly selected from different departments for private interview. 6 employees were conducted as individual interview and 4 employees conducted as group interview. All the interviewees were favorable with management and no negative information was raised.

L: Attitude of managers:

(Include attitude to audit, and audit process. Both positive and negative information should be included)

The managers were courteous and professional throughout the audit and allowed full access for the auditors to documents review, factory tour and employee interview.

M: Summary of main findings: (positive and negative)

(This is a summary <u>not</u> a repeat of the section detail)

Overall, 5 of non-compliances were noted during the audit:

Safety and Hygienic Conditions:

- 1. It was noted that the evacuation doors used at 1 out 2 safety exits in the finishing workshop in the 2nd floor and the evacuation doors used at 2 out 2 evacuation doors in the sewing workshop in the 3rd floor of the production building were rolling doors. Fixing device was installed to ensure that the door was open during working hours
- 2. It was noted that there is no transparent shield for 2 out of 2 twin needle sewing machines and 4 out 6 high speed sewing machines in the sewing workshop in the 3rd floor of the production building.
- 3. It was noted that the factory failed to provide the special equipment operator certificate for 1 pressure vessels operator in the factory for auditors' review.
- 4. It was noted that there was no records to show that factory have tested the factors of occupational hazards.

Wages and Benefits

According to the social insurance payment receipt provided by factory management, it was noted that only 17 out of 31 employees were provided with accident, medical(include maternity) insurance, only 8 out of 17 employees were provided with pension and unemployment insurance in March 2014.



Key Information

Key Information				
A: Do all workers (including migrant workers) have contracts of employment?	⊠ Yes □ No			
B: Were appropriate records available to verify hours of work and wages?	⊠ Yes □ No			
C: Were any inconsistencies found? (if yes describe nature)	☐ Yes ☐ Poor record keeping ☐ Isolated incident ☐ Repeated occurrence			
D: For the lowest paid production worker, are wages paid for standard hours (excluding	Wages found:	Please indicate the breakdown of workforce according to earnings:		
overtime) below or above the legal minimum?	☐ Below legal min ☐ Meet ☑ Above	% of workforce earning under min wage% of workforce earning min wage100_% of workforce earning above min wage		
E: % of piece rate workers: (if applicable)	0%			
F: Combined hours (standard and overtime) over 60 per week found?	☐ Yes ☑ No			
G: Are the correct overtime premiums paid?	⊠ Yes □ No			
H: Is there any night production work at the site?	☐ Yes ⊠ No			
I: % of workers living in site provided accommodation (if applicable):	N/A			
J: Age of youngest worker found:	19 years			
K: Workers under 18 subject to hazardous work assignments?	☐ No Not applicable (No en	of under 18's at this site (out of total workers) Inployees less than 18 years old were noted Iriew and employee interview.)		
L: What form of worker representation / union is there on site?	☐ Union (name) ☑ Worker Committee ☐ Other (specify) ☐ None	9		
M: Is it a legal requirement to have a union?	☐ Yes ☑ No			
N: Is It a legal requirement to have a workers committee?	☐ Yes ⊠ No			



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O: Is there any other form of effective worker/management communication channel? (Other than union/worker committee)	
P: Are there any External Processes?	☐ Sub-Contracting ☐ Homeworking ☐ Other External Process (detail) ☑ No external processes
Management Systems:	
Q: Nationality of Management	Chinese
R: Majority nationality of workers	Chinese
S: Number of workers leaving in last 12 months as a % of average total number of workers on site over the year (annual worker turnover)	20 %
T: Were accurate records shown at the first request?	⊠ Yes □ No
If not, why not?	N/A
In the last 12 months, has the site been subject to any fines/prosecutions for non-compliance to any regulations?	☐ Yes ☑ No Please describe: N/A



Worker Analysis

Worker Analysis								
	Local			Migrant				Total
	Permanent	Temporary	Agency	Permanent	Temporary	Agency	Home workers	Total
Worker numbers – male	2	0	0	22	0	0	0	24
Worker numbers – female	3	0	0	14	0	0	0	17
Total	5	0	0	36	0	0	0	41
Number of Workers interviewed	1	0	0	9	0	0	0	10

Contractors:

(Individuals supplying workers to site with the workers paid by contractors, not by site)

A: Any contractors on site?	☐ Yes ☑ No
B: If yes, how many workers supplied by contractors	N/A (no contract worker was noted in the factory.)
C: Are all contractor workers paid according to law: (please record evidence)	N/A (no contract worker was noted in the factory.)

Migrant Workers:

Please see SMETA Best Practice Guidance - Page 37

D: Originating Locations/Countries:	Different provinces such as Jiangxi, Hunan, Hubei, Sichuan, Henan, Guizhou, Shanxi, Guangdong etc.
E: Work undertaken by migrant workers:	Cutting, Sewing , Finishing and Packing
F: Were migrant workers recruited through an agency?	No
If yes, is there a contract with the agency? Provide details of agencies and contractual arrangements	N/A
G: Percentage of migrant workers in	87.8%



company provided accommodation:

Audit Results by Clause

0: Management systems and code implementation:

- 0.1 Suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 0.2 Suppliers shall appoint a senior member of management who shall be responsible for compliance with the Code.
- 0.3 Suppliers are expected to communicate this Code to all employees.
- 0.4 Suppliers should communicate this code to their own suppliers and, where reasonably practicable, extend the principles of this Ethical Code through their supply chain.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Time records, production records, worker interview, management interview

Description of Current Status:

The factory communicates this Code to all employees by training as confirmed by training records and worker interviews. During the visit, auditors cross-checked the time records provided by the factory management with production related records such as inspection records and private interview results to corroborate the information on the payroll and time records provided by factory management. Inconsistencies were not found between the records and employee interview results.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Nothing to report		
	Nothing to report	
Observation		
Description of observation:	Objective evidence observed:	
Nothing to report	Nothing to report	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
Nothing to report		
	Nothing to report	



1: Employment is Freely Chosen

ETI

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Based on documents review, management and employee private interviews, no forced, bonded or involuntary prison labor was noted and all sampled employees were not required to lodge "deposits" or their identity cards and were free to leave or resign after reasonable notice.

Description of current status:

The factory hired new employee through posters at the factory gate and advertisements on newspapers and referrals of the existing workers.

Non-compliance:		
Description of non-compliance: Nothing to report	Objective evidence observed: Nothing to report	
Observation		
Description of observation: Nothing to report	Objective evidence observed: Nothing to report	
Good Examples observed:		
Description of Good Example (GE): Nothing to report	Objective evidence observed: Nothing to report	



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

FTI

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

Evidence of Compliance and Current Status:

Please Note: include evidence examined & description of current status.

Documents checked & comments:

B: Is there any evidence that this is

Specify date of last meeting; topics covered; how minutes were communicated etc.

effective?

Per factory management representation and employee interview, employee committee was established in the factory but with no union established in the factory. The factory established a written policy to recognize and respect the right of workers to raise their grievance.

Description of current status:

All workers would freely go to management for any issues or send letters via suggestion boxes or employee committee for concerns and complaints.

Non-compliance:			
Nothing to report		Objective evidence observed:	
		Nothing to report	
Observation			
Description of observation:		Objective evidence observed:	
Nothing to report		Nothing to report	
A: Name of union and union representative, if applicable:	N/A		
If no union what is parallel means of consultation with workers e.g. worker committees?	Suggestion box, employee committee		

Yes, the last meeting was held on January 10, 2014, the topic was

regarding the holiday arrangement for spring festival.



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C: Are any workers covered by Collective Bargaining Agreement (CBA)	☐ Yes ⊠ No	
If yes what percentage by trade Union/worker representation	N/A% workers covered by Union CBA	N/A% workers covered by worker rep CBA
D: Does the Collective Bargaining Agreement (CBA) include rates of pay	☐ Yes ☐ No ☑ No CBA	
	Good Examples observed:	
Description of Good Example (GE):		Objective evidence observed:
Nothing to report		Nothing to report



3: Working Conditions are Safe and Hygienic

FTI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

Factory tour, document review, employee interview, management interview

Description of current status:

Through factory tour, it was noted that:

The work stations were well ventilated and lighting.

The factory maintained a comfortable temperature throughout work floors.

The factory posted the evacuation plans on work floors.

First aid kits with sufficient supplies were accessible in every work floors.

Drinkable water and toilet were available in workshops.

Workers receive regular and recorded health & safety training.

Non-compliance:

1. Description of non-compliance:

It was noted that the evacuation doors used at 1 out 2 safety exits in the finishing workshop in the 2nd floor and the evacuation doors used at 2 out 2 evacuation doors in the sewing workshop in the 3rd floor of the production building were rolling doors. Fixing device was installed to ensure that the door was open during working hours

Legal Requirement: In accordance with Article 7.4.12 of the Code for design of building fire protection and prevention (GB50016-2006), the evacuation door in the building shall meet the following requirements:

- 1. The evacuation door in the civil building and factory building shall be opened to the evacuation direction. Except for Classification A, B production building, there is no restriction on the opening direction of the door if there's no more than 60 persons in the room and the average evacuation capacity of each floor is no more than 30 persons.
- 2. The evacuation door of the civil building and factory shall be side-hung door, and shall not be sliding door, roller shutter, overhung door or revolving door.
- 3. The evacuation door of storage shall be side-hung door to the evacuation direction. Sliding door or roller shutter may be used at the outside surface of the wall on the first floor. Sliding door or roller shutter shall not be used in Classification A, B storage.
- 4. The evacuation door that needs to be controlled for people going in and out at will in

1. Objective evidence observed:

Per factory tour, Please refer to photo No.1



densely populated place or the outdoor of the residential building controlled by electric devices shall be opened easily from the inside without using any tools such as key etc. in case of fire. Signs and operation explanation shall be labeled at the well-marked place.

Recommended Corrective Action: It is recommended that management adopt practices and controls to ensure that no rolling doors are used at safety exits for workshop.

2. Description of non-compliance:

It was noted that there was no transparent shield for 2 out of 2 twin needle sewing machines and 4 out 6 high speed sewing machines in the sewing workshop in the 3rd floor of the production building.

Legal Requirement: In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the exposed dangerous components or part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels, electric saw and others, which is within 2 meters height of the plane where the operator is operating such devices shall be equipped with safety devices.

Recommended Corrective Action: It is recommended that management adopt practices and controls to ensure that twin needle sewing machines and high posted sewing machines are equipped with transparent shield.

3. Description of non-compliance:

It was noted that the factory failed to provide the special equipment operator certificate for 1 pressure vessels operator in the factory for auditors' review.

Legal Requirement: In accordance with Article 23 of Production Safety Law of the People's Republic of China, the special operation staff members of the production and business operation entities may not start to work at their positions until they have passed the special training regarding safe operations and obtained qualification certificates for special operations according to the relevant provisions of the state. In accordance with Article 2 of Measures for Supervision and Management of the Operating Personnel of Special Equipment, the operators and related management personnel of special equipments regarding boilers, pressure vessels (including gas cylinders), pressure pipes, elevators, lifting appliances, passenger ropeway, large-scale recreational facilities, motor vehicles in the plant and so on are referred to as special equipment operator. The list of operation species and types for operating personnel of special equipment is issued by National Administration of Quality Supervision, Inspection and Quarantine.

The operator of special equipment shall pass the testing and obtain the special equipment operator certificate in accordance with this Regulation before starting to the relevant work or management.

Recommended Corrective Action: It is recommended that management adopt practices and controls to ensure that special equipment operator certificate is obtained for 1 pressure vessels operator in the factory.

2. Objective evidence observed:

Per factory tour.

Please refer to photo No.2

3. Objective evidence observed:

Per documents review



4. Description of non-compliance:

NC against ETI It was noted that there was no records to show that factory have tested the factors of occupational hazards.

Legal Requirement: In accordance with Provisions on the Supervision and Administration of Occupational Health at Work Sites article 20 an employer with occupational hazards shall entrust an occupational health technical service institution with the corresponding qualification to conduct testing of factors of occupational hazards at least once each year.

Recommended Corrective Action: It is recommended that management adopt practices and controls to ensure to entrust an occupational health technical service institution with the corresponding qualification to conduct testing of factors of occupational hazards at least once a year.

4. Objective evidence observed:

Per documents review and management interview. Factory management represented that they would correct as soon as possible.

Observation		
Description of observation:	Objective evidence observed:	
Nothing to report	observed.	
Nothing to report	Nothing to report	
Good Examples observed:		

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
Nothing to report	Nothing to report



4: Child Labour Shall Not Be Used

ETI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Policy review
- Document review
- Management interview
- Worker interview

Description of current status:

- 1. The factory establishes a policy that will never employ and use any child labour under the age of 16 years old.
- 2. The factory will verify all workers' original ID cards at the time of recruitment and keep the photocopies of workers' ID cards in the personnel files.
- 3. Sufficient numbers of employees' personal files were provided for review. Each employee file includes a bio-data sheet, a recent photo and the age documentation, which is in the form of photocopied national identification card. The card lists the employee's name, household address and the date of birth.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Nothing to report		
	Nothing to report	
Observation		
Description of observation:	Objective evidence observed:	
Nothing to report	0.0001 1001.	

Good Examples observed:	
	Objective evidence observed:
Nothing to report	Nothing to report

Nothing to report



5: Living Wages are Paid

FTI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Document review
- Worker interview
- Management interview

Description of current status:

It was noted that all production employees were paid by hourly rate.

Non-compliance:

1. Description of non-compliance:

According to the social insurance payment receipt provided by factory management, it was noted that only 17 out of 31 employees were provided with accident, medical(include maternity) insurance, only 8 out of 17 employees were provided with pension and unemployment insurance in March 2014.

Legal Requirement: In accordance with Article 73 of the Labor Law of the People's Republic of China, employees shall, in accordance with the law, be entitled to social insurance benefits under the following circumstances: (1) retirements; (2) illness or injury; (3) disability caused by work-related injury or occupational disease; (4) unemployment; and (5) maternity.

The survivors of the insured laborers shall be entitled to subsidies for survivors in accordance with the law. The conditions and standards for laborers to enjoy social insurance benefits shall be stipulated by laws, rules and regulations. The social insurance amount that laborers and entitled to, must be timely paid in full amount.

Recommended Corrective Action: It is recommended that factory management adopt practices and controls to ensure that employees receive all of their statutory welfare entitlements.

Objective evidence observed:

Per documents review

	bservation	
Description of observation:		Objective evidence observed:



Nothing to report	Nothing to report	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
Nothing to report	Nothing to report	

Wages analysis:			
A: Sample size: (number of wages checked and which weeks or months – please see BPG)	4 samples from current month January 2014, 3 samples from October 2013 and 3 samples from March 2013		
B: Legal minimum wage for standard time: (excluding OT - please include time period e.g. hour/week/month)	RMB 1100 per month or RMB 6.32 per hour before May 1, 2013 RMB 1310 per month or RMB 7.53 per hour since May 1, 2013		
C: Are there different legal minimum wage grades? If yes, please specify all.	☐ Yes ☐ If yes, please give details:		ls:
D: Where there are different legal minimum wage grades are all workers graded correctly?	☐ Yes ☐ No Not applicable	e	If no, please give details:
E: What deductions are required by law:	Social Insura	nce	
F: Have all of these deductions been made?	No		
G: Industry norm for this region: (please include time period e.g. hour/week/month)	N/A (no such industry norm in China)		
H: Legal overtime premium for weekdays: (please include time period e.g. hour/week/month)	Not less than	150% of normal wage	
I: Legal overtime premium for rest days: (please include time period e.g. hour/week/month)	Not less than	200% of normal wage	
J: Legal overtime premium for holidays: (please include time period e.g. hour/week/month)	Not less than	300% of normal wage	



Worker Type	Process Operator (Highest paid)	Process Operator (Average paid)	Process Operator (Lowest paid)
Select one worker's records from each "Worker Type" and populate the boxes. Ensure comparison is made for same pay period (peak) and only uses full-time workers. See SMETA Best Practice Guidance for completing this:			
A: Pay period (please include time period e.g. hour/week/month):	October 2013	January 2014	March 2013
B: Anonymous Employee Reference/Dept.	Employee A/Sewing workshop	Employee B/Sewing workshop	Employee C/Sewing workshop
C: Employee Gender	F	М	М
D: Contracted wage (please include time period e.g. hour/week/month):	Paid by hourly rate, RMB10 per hour	Paid by hourly rate, RMB10 per hour	Paid by hourly rate, RMB10 per hour
E: Standard working hours (excluding OT - please include time period e.g. hour/week/month):	160 hours per month	136 hours per month	80 hours per month
F: Standard work pay rate (excluding OT - please include time period e.g. hour/week/month):	RMB 1600 per month	RMB 1360 per month	RMB 800 per month
G: Standard day overtime - hours (please include time period e.g. hour/week/month):	4 hours per month	12 hours per month	0 hour per month
H: Standard day overtime - wage (please include time period e.g. hour/week/month):	RMB 60 per month	RMB 180 per month	RMB 0 per month
I: Rest day overtime – hours (please include time period e.g. hour/week/month):	32 hours per month	24 hours per month	8 hour per month
J: Rest day overtime – wage (please include time period e.g. hour/week/month):	RMB 640 per month	RMB 480 per month	RMB 160 per month
K: Statutory Holiday overtime – hours (please include time period e.g. hour/week/month):	0 hour per month	0 hour per month	0 hour per month
L: Statutory holiday OT - wages (please include time period e.g. hour/week/month):	RMB 0 per month	RMB 0 per month	RMB 0 per month
M: Total overtime hours (please include time period e.g. hour/week/month):	36 hours per month	36 hours per month	8 hours per month



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N: Incentives/Bonus/ Allowances etc. (please include time period e.g. hour/week/month):	Allowance: RMB 400 per month Legal holiday wage: RMB 240 per month		Allowance: RMB 370 per month Legal holiday wage: RMB 480 per month	Allowance:RMB410 per month
O: Gross wages (please include time period e.g. hour/week/month):	RMB 2940 per month		RMB2870 per month	RMB 1370 per month
P: Social insurance and other deductions	RMB 0 per month		RMB 0 per month	RMB 0 per month
Q: Actual wage paid after deduction (please include time period e.g. hour/week/month):	RMB2940 per month		RMB2870 per month	RMB 1370 per month
Comments: (Please state here any speci	fic reasons	c/circumstances tha	t explain the lowest and highe	st gross wages)
Nil				
R: Is there a defined living w. This is not normally legal wage. If a please state amount and source of Please see BPG)	rmally legal wage. If answered Y No mount and source of info: Please specify amount/time period: N/A			
S: Are workers paid in a time manner in line with local law		⊠ Yes □ No		
T: Is there evidence that equal rates are being paid for equal work:		 ☐ Yes ☐ No Details: Male and female workers paid the same wage for same job. 		e wage for same job.
U: How are workers paid:		☐ Cash ☐ Cheque ☐ Bank Transfer If not explain:		
Actual overtime premium pai sample for	d in			
V: Weekdays:		150%		
W: Rest days:		200%		
X: Holidays:	N/A (no overtime on holidays)			



6: Working Hours are not Excessive

ETI

- 6.1 Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- 6.2 In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Time records
- Employee interview
- management interview

Description of current status:

Through employees' interview, overtime is voluntary.

- 1. Through employees' interview, overtime is voluntary.
- 2. There was only one work shift from 8:00 to 12:00 and 13:30 to 17:30.
- 3. According to the attendance time records, it was noted that the normal working hour were 8 hours per day and 40 hours per week.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Nothing to report		
	Nothing to report	
Observation		
Description of observation:	Objective evidence	
Nothing to report	observed:	
	Nothing to report	

Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
Nothing to report	Nothing to report	



Working hours analysis Please include time period e.g. hour/week/month			
A: What timekeeping systems are used: time card etc.	Swipe card system		
B: Sample size checked (number of workers): Please see BPG	4 samples from current month January 2014, 3 samples from October 2013 and 3 samples from March 2013		
C: Legal standard work week (hours): (Excluding OT - please include time period e.g. hour/week/month).	40 hours per week		
D: Contracted standard work week this site (hours) (excluding OT - please include time period e.g. hour/week/month)::	40 hours per week		
E: Actual standard work week averaged over sample for full time workers: (excluding OT - please include time period e.g. hour/week/month)	40 hours per week		
F: Lowest standard hours worked (excluding OT - please include time period e.g. hour/week/month)	40 hours per week		
G: Highest standard hours worked (excluding OT - please include time period e.g. hour/week/month)	40 hours per week		
H: Percentage workers on part-time contracts	0_ % age		
I: Legal permitted overtime hours (please include time period e.g. hour/week/month)	3 hours a day and 36 hours a month		
J: Any local waivers or permission for annualised hours for this site:	No		
K: Actual overtime hours: (averaged over sample) (please include time period e.g. hour/week/month)	36 hours in January 2014 36 hours in October 2013 24 hours in March 2013		
L: Range of overtime hours over all workers: (quote highest and lowest please include time period e.g. hour/week/month)	36 to 36 hours in January 2014 36 to 36 hours in October 2013 8 to 32 hours in March 2013		
M: approx % of workers on highest overtime hours:	_20_ %		
N: Peak season(s):	Not obvious		



Comments:

(Please state here any specific reasons/circumstances that explain the highest working hours)

Nil

7: No Discrimination is Practiced

ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Employee interview
- Management interview
- Documents review

Description of current status:

Through employee interview, management interview and documents review:

Based on the review of factory regulations and employee private interview, no discrimination was noted regarding hiring, job assignment, wages, bonus, allowance, promotion, discipline, work assignment, gender, age and nationality. All sampled employees interviewed stated that they were treated fairly and compensated the same wage for the same job.

Non-compliance:		
Description of non-compliance: Nothing to report	Objective evidence observed: Nothing to report	

Observation		
	Objective evidence observed:	
Nothing to report	Nothing to report	

Good Examples observed:	
Description of Good Example (GE):	Objective evidence observed:
Nothing to report	Nothing to report



8: Regular Employment Is Provided

ETI

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

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Document review
- Worker interview
- Management interview

Description of current status:

Based on documents review and workers interview, it was noted that all workers had signed labour contracts with the factory and no agent workers were used in this factory. All interviewed workers stated that they were provided with a copy of the labour contract which contained all necessary information such as term of the employment contract, job description and workplace, working hours, remuneration and social insurance.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Nothing to report	Nothing to report	
Observation		
Description of observation:	Objective evidence observed:	
Nothing to report	Nothing to report	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
Nothing to report	Nothing to report	



8A: Sub-Contracting and Homeworking:

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

8A.2. Systems and processes should be in place to manage sub-contracting, homeworking and external processing. Note to auditor on homeworking: Report on whether it is direct or via agents. How many workers, relationship with site and what control systems are in place.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Document Review
- Factory Tour
- Management interview
- Worker interview

Description of current status:

It was verified through document review, factory tour, management interview and employee interview that no Home working was used by this factory and no sub-contracting.

Non-compliance:		
Description of non-compliance:	Objective evidence observed:	
Nothing to report	Nothing to report	
	rouning to repert	
Observation		
Description of observation:	Objective evidence observed:	
Nothing to report	Nothing to report	
	<u> </u>	
Good Examples observed:		
Description of Good Example (GE):	Objective evidence observed:	
Nothing to report	Nothing to report	



Summary of sub-contracting – if applicable				
A: Number of sub-contractors/agents used	0			
B: Is there a site policy on sub- contracting?	☐ Yes ☐ No N/A If yes, summarise details:			
C: What checks are in place to ensure no child labour is being used and work is safe?	N/A			
D: What processes are sub- contracted?	N/A			
Summary of homeworking – if applicable				
	, ,	п арричаль		
E: Number of homeworkers	Male: 0	Female: 0	Total: 0	
F: Are homeworkers employed direct or through agents?	☐ Directly ☐ Through Agents Not applicable (no sub-contracting was used in the factory.)			
G: If through agents, number of agents	Not applicable (no sub-contracting was used in the factory.)			
H: Is there a site policy on homeworking?	☐ Yes ☐ No Not applicable (no sub-contracting was used in the factory.)			
I: How does site ensure worker hours and pay meet local laws for homeworkers?	Not applicable (no sub-contracting was used in the factory.)			
J: What processes are carried out by homeworkers?	Not applicable (no sub-contracting was used in the factory.)			
K: Are written agreements in place for homeworkers that include regular employment?	☐ Yes ☐ No Not applicable (no sub-co	ontracting was used in the	factory.)	
L: Are full records available at the site?	☐ Yes ☐ No Not applicable (no sub-contracting was used in the factory.)			



9: No Harsh or Inhumane Treatment is Allowed

ETI

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation be prohibited.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Policy review
- Worker interview
- Management interview

Description of current status:

The factory established anti-harsh or inhumane treatment policy. The policy states that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. Through the factory management and workers' interview, it was noted that no physical abuse or discipline happened in the factory and the disciplinary procedure of the factory is verbal warning and education.

Non-compliance:				
Description of non-compliance: Nothing to report	Objective evidence observed:			
3	Nothing to report			
Observation				
Description of observation:	Objective evidence observed:			
Nothing to report	Nothing to report			
	3			
Good Examples observed:				
Description of Good Example (GE):	Objective evidence observed:			
Nothing to report	Nothing to report			



10. Other Issue areas: 10 A: Entitlement to Work and Immigration

Additional Elements

10A1 Only workers with a legal right to work shall be employed or used by the supplier.

10A2 All workers, including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.

10A3 employment agencies must only supply workers registered with them.

10A4 the supplier shall implement processes to enable adequate control over agencies with regards the above points and related legislation.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Factory tour
- Document review
- Worker interview
- Management interview

Description of current status:

Only workers with a legal right to work shall be employed or used by the factory. There are no agency staffs, employment agencies and immigration workers in the factory

Non-compliance:				
Description of non-compliance: Nothing to report	Objective evidence observed: Nothing to report			
Observation				
Description of observation:	Objective evidence observed:			
Nothing to report	Nothing to report			
_				
Good examples observed:				
Description of Good Example (GE):	Objective evidence observed:			
Nothing to report	Nothing to report			



10. Other issue areas 10 B 2: Environment 2-pillar

This section only to be completed only 2-Pillar SMETA Audit. Remove this section if this is a 4-Pillar audit

10B2. 1 Suppliers must comply with the requirements of local and international laws and regulations including having necessary permits.

10B2. 2 The supplier should be aware of and comply with their end clients' environmental requirements. Note for auditors and readers, This is not a full environmental assessment but a check on basic systems and management approach.

Evidence of Compliance and Current Status

Please Note: include evidence examined & description of current status.

Documents checked & comments:

- Document review
- Factory tour
- Management interview

Description of current status:

The factory conducted some training for all employees on the avoidance of environmental impact.

Non-compliance:				
1. Description of non-compliance:	Objective evidence observed:			
Nothing to report				
	Nothing to report			
Observation				
Description of observation:	Objective evidence observed:			
Nothing to report	Nothing to report			
	Nothing to report			
Good examples observed:				
Description of Good Example (GE):	Objective evidence observed:			
Nothing to report	Nothing to report			
	3			



Worker Interview Summary

Worker Interview Summary					
A: Were workers aware of the audit?	☐ Yes ☑ No				
B: Were workers aware of the code?	⊠ Yes □ No				
C: Number of group interviews: Please specify number and size of groups. Please see BPG	1 groups of 4 employees				
D: Number of individual interviews Please see BPG	Male: 5	Female: 1			
E: Number of interviewed workers Please see BPG	Male: 8	Female: 2			
F: Interviews were done in private and the confidentiality of the interview process was communicated to the workers?	⊠ Yes □ No				
G: In general, what was the attitude of the workers towards their workplace?	☐ Favourable ☐ Non-favourable ☑ Indifferent				
H: What was the most common worker complaint?	Nil				
I: What did the workers like the most about working at this site?	Nil				
J: Any additional comment(s) regarding interviews:	Nil				
·					
Agency Workers (workers sourced from a local agent who are not directly paid by the site)					
A: Number of agencies used (average):	Not applicable (no agency was used by the factory.) And names if available:				
B: Were agency workers' age/pay/hours included within scope of this audit	☐ Yes ☐ No Not applicable (no agency was used by the factory.)				



Other findings

Other Findings Outside the Scope of the Code

Nothing to report

Community Benefits

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

Nothing to report



Photo Form







Factory name

Factory gate

Production building







Cutting workshop

Sewing workshop

Finishing and Packing workshop







Raw material warehouse

Time attendance system

First aid kit







Suggestion box

Toilet

Drinking water





Non-compliance photo





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

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

Click here for A & AB members: http://www.surveymonkey.com/s.aspx?sm=riPsbE0PQ52ehCo3lnq5lw_3d_3d

<u>Click here for B members:</u>
http://www.surveymonkey.com/s.aspx?sm=d3vYsCe48fre69DRgIY_2brg_3d_3d



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