

# Sedex Members Ethical Trade Audit Report

Version 7





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# Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Minimum Requirements were applied and the SMETA Auditor Manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA Methodology are stated (with reasons for deviation) in the SMETA Declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the following Code Areas:

## Included in a 2-Pillar audit:

1. Labour Standards Code Areas:
  - 0: Enabling accurate Assessment
  - 1: Employment is Freely Chosen
  - 1.A: Responsible Recruitment & Entitlement to Work
  - 2: Freedom of Association and Right to Collective Bargaining are Respected
  - 4: Child Labour Shall Not be Used
  - 5: Legal Wages are Paid
  - 5.A: Living Wages are Paid
  - 6: Working Hours are Not Excessive
  - 7: No Discrimination is Practiced
  - 8: Regular Employment is Provided
  - 8.A: Sub-contracting and Homeworkers are Used Responsibly
  - 9: No Harsh or Inhumane Treatment is Allowed
2. Health & Safety Code Area:
  - 3: Working Conditions are Safe and Hygienic
3. Environment Code Area:
  - 10.A: Environment 2-Pillar

## Included in a 4-Pillar audit:

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



- (2) Where appropriate, non-compliances or non-conformances were raised where either local law or the Base Code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.
- (3) Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.



# Audit and site details

## Audit details

Sedex company reference	ZC3572750	Auditor company name	SGS_China
Date of audit	2025-03-31	Audit conducted by	Sedex member
Audit pillars	Labour Standards   Health and safety   Environment 4-Pillar   Business ethics		

## Site details

Sedex site reference	ZS1000031876	Site name	NINGBO TAPE INDUSTRIAL CO LTD
Business name	NINGBO TAPE INDUSTRIAL CO LTD	Site address	315757 YUSHANTOU VILLAGE,DONGQIAO TOWN,HAISHU,NINGBO,CHINA 宁波市海曙区洞桥镇鱼山头村, Ningbo, CN
Site phone	18957418192	Site email	Sale1@tapeningbo.com



# Audit parameters

Time in and out	Day 1	
	In	08:50
	Out	15:00
Audit type	Periodic	
Was the audit announced?	Announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	杨静凯 / 人事	
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	There was no union in the factory.		
Reason for absence during the audit	There was no union in the factory.		
Reason for absence at the closing meeting	There was no union in the factory.		



# SMETA declaration

## Auditor team

### SMETA declaration

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

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

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

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

Nil

Lead auditor	Jessie Jiang	APSCA Number	32200388
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Additional auditor	Will Ling	APSCA Number	32400234
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Date of declaration	2025-03-31
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## 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	杨静凯
Title	人事
Date of declaration	2025-03-31



## Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600863168</a>
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§2	NC <a href="#">ZAF600863169</a>



## Local law issues

§1	Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.
§2	Labor Law of the People's Republic of China (2018 Amendment), Article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.



# Management systems

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



Not addressed



Fundamental improvements required







Some improvements recommended



Robust management systems



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

-  Not addressed
-  Fundamental improvements required
-  Some improvements recommended
-  Robust management systems



# Site details

## Company and site details

Sedex company reference	ZC3572750
Sedex site reference	ZS1000031876
Company name	NINGBO TAPE INDUSTRIAL CO LTD
Business ownership type	GOODS
Site name	NINGBO TAPE INDUSTRIAL CO LTD
Site name in local language	宁波市海曙天博胶带制品有限公司
GPS location	<p><b>GPS address</b></p> <p>YUSHANTOU VILLAGE,DONGQIAO TOWN,HAISHU,NINGBO,CHINA. Remark: 1. The audited factory occupied the part of the 1/F of one 4-storey production building and part of the 1/F of one 2-storey production building with a total construction area of 811 square meters. The rest of area of the 1/F, 2/F to 4/F of one 4-storey production building, the rest of area of the 1/F and the 2/F of one 2-storey production building, three one 1-storey warehouse buildings and one canteen building were rented by another factory named Ningbo Tianbo First Aid Product Co., Ltd. (hereinafter as "Tianbo First Aid"). Based on onsite observation and management interview, Tianbo First Aid and the audited factory have separate business licenses, management, production areas and employees, and no worker commingling was identified. Therefore, Tianbo First Aid was not covered into this audit scope. 2. Based on management interview and factory your, during this audit, the cutting process was idle because there were no relevant orders.</p> <p><b>Coordinates</b></p> <p>Latitude: 29.749300 N; Longitude: 121.415859 E</p>
Is the worksite in a remote location, far from habitation?	No



## Company and site details

Site contact	Contact name	Ms. Yang Jingkai
	Job title	HR
	Phone number	18957418192
	Email	Sale1@tapeningbo.com
Applicable business and other legally required business license numbers and documents	Business License Number:91330212684296825D. Valid period: from Apr 1, 2009 to long time. Fixed pollution source discharge registration receipt: No. 91330212684296825D001X, valid from Apr 28,2020 to Apr 27,2025	

## Site activities

Site function	Factory Processing/Manufacturer	
Site activities	Primary	Manufacture of other rubber products
	Secondary	
	Other	
Product type	Adhesive Tape and Lint Roller	
Process overview	The products manufactured at this site were adhesive tape and lint roller. The main operations as below: Cutting, Assembly, Inspection and Packing. The main equipment used in the factory were listed as below: 1 cutting machine and 1 assembly, inspection and packing line.	
What level of mechanization best describes the work at this site?	Low mechanisation / high manual Labour	

## Site scope

Is the audited site a physically continuous area?	No
	The audited factory occupied the part of the 1/F of one 4-storey production building and part of the 1/F of one 2-storey production building with a total construction area of 811 square meters. The rest of area of the 1/F, 2/F to 4/F of one 4-storey production building, the rest of area of the 1/F and the 2/F of one 2-storey production building, three one 1-storey warehouse buildings and one canteen building were rented by another factory named Ningbo Tianbo First Aid Product Co., Ltd.



## Site scope

Building 1	Last construction works on site	2013
	If building is shared, provide details	Part areas used by Tianbo First Aid.
	Number of floors	4
	Description of floor activities	1F: Part area was used as warehouse, the cutting, assembly, inspection and packing workshops by the audited factory, and the rest of area was used as warehouse by Tianbo First Aid. 2-4F: Used as warehouse by Tianbo First Aid
Building 2	Last construction works on site	2009
	If building is shared, provide details	Part areas used by Tianbo First Aid.
	Number of floors	2
	Description of floor activities	1F: Part area was used as warehouse and office by the audited factory, and the rest of area was used as warehouse by Tianbo First Aid. 2F: Used as warehouse and sample room by Tianbo First Aid.
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
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?	No	
Does the site organise worker transport to the worksite?	Not provided	Workers live in different areas, so it inconvenient for the factory to provide transportation.



## Work patterns

Approximate workers on site per month (% of peak)	January	50-75%	February	50-75%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night or back shift work at the site? No

## Site assessments

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

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? No  
No. The site has not assessed 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. There was no HRIA within the last three years at this site.



# Worker analysis

Gender disaggregated data available

Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	2 (13.3%)	13 (86.7%)	- -	15 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	2 (13.3%)	13 (86.7%)	- -	15 (100%)
Temporary or fixed term employees	- -	- -	- -	0 (0%)
Agency or subcontracted workers	- -	- -	- -	0 (0%)
Seasonal workers	- -	- -	- -	0 (0%)
Self-employed workers	- -	- -	- -	0 (0%)
Informal workers including home workers	- -	- -	- -	0 (0%)
Apprentices, trainees or interns	- -	- -	- -	0 (0%)

\* % of total workforce



## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	1 (10%)	9 (90%)	- -	10 (66.7%)
International migrant workers	- -	- -	- -	0 (0%)
Total migrant workers	1 (10%)	9 (90%)	- -	10 (66.7%)

\* % of total workforce

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

Provinces as below: Guizhou, Anhui and Hunan, etc.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	- -	- -	- -	0 (0%)
15 - 17 years old	- -	- -	- -	0 (0%)
Under 15 years old	- -	- -	- -	0 (0%)

\* % of total workforce



Is the worker analysis data relevant for peak season and current to the audit?	No
Describe how this may vary during peak periods	There was no observed peak season in the factory.
Please list the nationalities of all workers, with the three most common nationalities listed first	Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	13%	87%	-	100%



## Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	- -	- -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	- -	- -	- -	0 (0%)
Workers paid hourly / daily rate	- -	- -	- -	0 (0%)
Salaried workers	2 (13.3%)	13 (86.7%)	- -	15 (100%)

\* % of total workforce

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	- -	- -	- -	0 (0%)
Paid weekly	- -	- -	- -	0 (0%)
Paid monthly	2 (13.3%)	13 (86.7%)	- -	15 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details NA



## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (40%)	3 (60%)	- -	5
Supervisors or team leaders	- -	- -	- -	0
Administrative staff	3 (75%)	1 (25%)	- -	4



# 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      1 group of 5 workers, total 5 workers

Did workers understand the purpose of the audit?      No

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

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) NA. No negative feedback.
What did the workers like the most about working at this site?	Pay Freedom of movement
Additional comments	Most workers enjoyed working at this factory, they felt they had a good relationship with management in general.
Attitude of workers' committee/union representatives	Interviews with one worker representative, she stated that managers always acted on requests. The worker representative was happy with the working conditions, and she stated that they could give suggestions on all parts of the site's practices.
Attitude of managers	The factory management agreed that the auditors could access to all facilities, compound documents and records requested by the auditors, to take photo of the factory, to copy relevant document records and to conduct confidential worker's interview. During the audit, management showed they were willing to gradually improve all issues found onsite.

## Workers interviewed by type

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

## Workers interviewed by group/individual

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



## Workers interviewed by group/individual

Workers interviewed individually	1	4	-	5
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## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	1	7	-	8
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	1	7	-	8



# Measuring workplace impact

Gender disaggregated data available

Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	1.0%	3.0%	-	4.0%
Previous full calendar year (2023)	2.0%	4.0%	-	6.0%

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

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	2.0%	-	3.0%
Last full calendar year (2024)	2.0%	4.0%	-	6.0%
Previous full calendar year (2023)	3.0%	4.0%	-	7.0%

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

Are accidents recorded?

Yes

The factory had provided accidents records in past one year to auditor for review, there were no accident happened.

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

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

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	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 (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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

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



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

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%



## 0. Enabling accurate assessment

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	<p>1.The factory management agreed that the auditors could access to all facilities, compound documents and records requested by the auditors, to take photo of the factory, to copy relevant document records and to conduct confidential worker's interview.</p> <p>2.The written human rights policy covering human rights impacts and issues which had published to all the workers.</p> <p>3. Mr. Cai Zhihui/General Manager was designated to be responsible for implementing standards concerning Human rights.</p> <p>4.The factory provided an accurate site description and Sedex site profile declared prior to or during the audit.</p> <p>5.The facility has not bribed or threatened the auditor or in any way induced the auditor to be dishonest.</p> <p>Details:</p> <p>1. Human rights policy</p> <p>2. SAQ</p> <p>3. Appoint letter of human right representative</p> <p>4. Training records of human right representative</p> <p>5. Worker interview and management interview</p> <p>6. Business license</p>		



0. Enabling accurate assessment

Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment?	No
Did any workers selected by the auditor decline to be interviewed?	No
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Yes  There is no non-employee workers in the factory.



# 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	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Prevention of forced labor, discrimination, and harassment control procedures 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 'Recruitment and Onboarding' procedure. Employees are free to choose whether to work overtime or not, employees can easily apply for leave and no cases of forced labor have been found.</p> <p>2) Resources: Human resources are dedicated to conducting fair and thorough recruitment processes, with trained staff handling interviews and evaluations. A senior director is responsible to ensure compliance on this module. But this role was also taking responsibility for other management, not a dedicated role.</p> <p>3) Communication &amp; Training: All employees involved in the recruitment process receive regular training on unbiased hiring practices. They are educated on how to avoid unconscious biases during interviews and evaluations. Internal communication within the recruitment team is also enhanced to ensure everyone is aligned with the principles of free choice in employment. All employees have done a series of relevant training and verified the effectiveness of the training.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. The factory had a policy which prohibited forced labour, and this was available for review.
  2. There was a non-formalised application procedure which stated that workers present their IDs for proof of age but only copies should be kept in the personnel files and the original given back to the workers.
  3. The terms and conditions of employment in the handbook stated that the workers were free to leave the workplace outside of their working hours.
  4. The workers were not required lodging deposits or their Identity papers to the factory at the beginning of employment.
  5. No forced, bonded, or involuntary prison labour was identified during the audit.
  6. According to the Hiring and Termination procedure and the reviewed labour contracts the workers can resign within 30-days' notice period, which is allowed by law.
- Details:
1. Personnel files
  2. Resignation records
  3. Factory rules
  4. Employee handbook
  5. Management and worker interview
  6. Hiring and Termination procedure



1. Employment is freely chosen

Data points

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



# 1.A. Responsible recruitment and entitlement to work

## Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Human Resource Management Procedure outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Employees can freely choose their careers without any recruitment fees</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. But this role was also taking responsibility for other management, not a dedicated role. The senior director has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory.</p> <p>3) Communication &amp; Training: All employees 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.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively.</p>

## Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. Based on documents review, factory management representation and worker interview, all employees in the factory were Chinese, no migrant employees from other country was noted in the facility.
  2. All employees had the proper legal rights to work in this region. Employees can freely choose their careers without any recruitment fees.
  3. The youngest worker on site was 26 years old. All workers were recruited directly by the facility.
  4. No agency was used in factory for recruitment process.
- Details:
1. Hiring and Termination procedure.
  2. Duties and responsibilities of the HR Executive.
  3. Personal files of sampled workers.
  4. Employee Roster
  5. Worker and management interview



## 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 (including 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?	Not Applicable

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	67%
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	Provinces as below: Guizhou, Anhui and Hunan, etc.



## Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process?	Not Applicable
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Were recruitment fees or costs identified during worker interviews?	No
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## 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	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Freedom of Association and the Right to Collective Bargaining policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documents clearly assign responsibilities, processes in place and address all code areas - they can be considered robust.</p> <p>2) Resources: A senior director is responsible to ensure compliance on this module. But this role was also taking responsibility for other management, not a dedicated role.</p> <p>3) Communication &amp; Training: Regular training programs are designed for worker representatives on how to gather and convey the concerns of the employees effectively. Communication channels are established, with regular meetings and posters for representative to update employees on their activities and the outcomes of discussions with management.</p> <p>4) Monitoring: The meeting room was provided for the worker committee to conduct meeting with management, the factory monitors the frequency and quality of meetings between representatives and management. But factory did not conduct a worker satisfaction survey in a routine manner to monitor workers' actual satisfaction.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. There was no union in the factory.
  2. Two worker representatives were elected freely, and meeting was conducted regularly. The latest meeting was conducted on Jan 15, 2025. The meeting records were provided for review.
  3. The workers could rise their opinion through worker representative, suggestion box or communicate with their supervisor directly.
  4. The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.
- Details:
1. Interview with workers
  2. Interview with managers
  3. Interview with worker representative
  4. Social responsibility policy
  5. Meeting records



## 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 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



## 3. Working conditions are safe and hygienic

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures: The factory's Health&amp;Safety and Environmental policy outlining the systems in place to manage this issue at the site includes some relevant requirements of the code area. But there was no dedicated management goal set for health &amp; safety management.</p> <p>2) Resources: Documents clearly assign responsibilities, and skilled safety officer and hygiene specialist, are employed to oversee and implement relevant protocols. A senior director is responsible to ensure compliance on this module. and has received a internal training on the policy and used the knowledge to develop effective processes in the factory. But this role was also taking responsibility for other management, not a dedicated role.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training, but the effectiveness of the training should be improvement. The H&amp;S committee exists but is not fully functional, the training of electric machines was not effective.</p> <p>4) Monitoring: Regular inspections are either not carried out thoroughly or the inspection process fails to identify such as electric machines not deal as law requirement. The factory lacks a system to hold accountable those responsible for monitoring, and corrective actions are not taken in a timely manner when issues are identified, leading to unsafe situation.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. General Health and Safety management
    - Health& safety policy was established in the factory and the factory managers were familiar with it.
    - The factory conducted training on H&S to workers regularly.
    - Potable water was provided free of charge to workers in factory.
    - Based on the observation on site, lavatory facilities were accessible, clean and adequate in number, segregated for men and women, washbasins and water taps were available and adequate.
    - Ventilation, temperature and lighting were adequate for the production processes.
    - Based on the observation on site, production building was clean and tidy, no cracks or other abnormality in the walls of the building was observable.
    - Mr. Cai Zhihui/General Manager appointed as Health & Safety Manager for the site.
  2. Fire Safety
    - There were at least 2 exits for each work area.
    - Based on the observation on site, fire extinguishers were inspected once every month, and records were available.
    - Evacuation diagrams were posted in all areas in the production buildings. It was understood by all workers interviewed.
    - The factory conducted the latest fire drill in production area on Mar 14, 2025.
    - Emergency light, evacuation indicating sign and exit signs were installed for all fire exits and fire passageways.
  3. Electrical safety
    - There was one competent electrician at the site, and the training certificates were available for review.
  4. Chemical safety
    - Workers confirmed that they were trained on correct handling procedures as well as what to do in an emergency.
  5. Medical services
    - There were adequate first aid kits in each production area and they were well stocked.
    - There was one qualified first aider in the factory.
  6. Equipment safety
    - Based on the review of accident, injury records, no serious accident or injury was occurred during the last 12 months..
- Details:
1. Health& safety policy
  2. Trained first aider certificate
  3. Accident, injury records
  4. Fire drill program & records and fire evacuation plan & procedure (including pictures)
  5. Training records on H&S to workers.
  6. Fire equipment maintenance records
  7. Certificates of electrician
  8. Inspection report for the special equipment.
  9. Certificates of special equipment operator.
  10. Interviews with H&S manager
  11. MSDS for all chemicals used and stored in the factory.
  12. Interviews with workers and H&S committee members



### 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?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable There was no added floors in the factory.
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
Does the site have a structural engineer evaluation?	Yes



## 4. Child labour shall not be used

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Child labour not be used and protection of underage labour programs' policy outlining the systems in place to manage this issue at the site includes some relevant requirements of the code area. There are strict procedures in place for age verification during the recruitment process. Every job application is meticulously screened, and relevant identification documents are thoroughly checked to ensure the candidate's age complies with the law.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. But this role was also taking responsibility for other management, not a dedicated role. The senior director has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory.</p> <p>3) Communication &amp; Training: All employees, from top management to entry - level staff, undergo regular training on child labour laws and the company's zero - tolerance policy. This training includes how to identify signs of potential child labour and the correct procedures to follow if any suspicion arises. Communication channels are established to raise awareness among employees. For example, posters are used to constantly remind everyone of the company's commitment. There is also suggestion box for employees to report any concerns confidentially.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively. The youngest worker on site was 26-year-old.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

- 1. Based on document review, the factory established effective procedure to verify the workers' ages during the recruitment. There was an informal procedure for checking ages of workers at application stage, and this includes checking ID's.
  - 2. Once workers joined, their original ID's were copied and given back to them whilst copies only were kept in their personnel file.
  - 3. Checks of all workers files showed that the youngest worker on site was 26 years old who was born on Jun 23, 1998 and entered the factory on Jan 30, 2024.
- Remark: In China, minimum age of worker is 16 years old. Workers between 16 -18 are regarded as young labour.
- Details:
- 1. Recruitment policy and Procedures
  - 2. Latest employee list
  - 3. Personnel files and employment registration/roster of all workers
  - 4. ID copies
  - 5. Interview with management and workers



4. Child labour shall not be used

# Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	26
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?	Not Applicable



## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures: The factory's Salary and Benefit 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. But the policy did not include of all the code area.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. But this role was also taking responsibility for other management, not a dedicated role.</p> <p>The senior director has received a internal training on the policy and used the knowledge to develop effective processes in the factory.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training on wage policies during on boarding, 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. But the factory did not provide good training for employees in terms of social security to ensure that all employees are willing to purchase social security.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies. Additionally, employee feedback regarding wages is closely monitored through informal channels, enabling prompt resolution of any issues that may arise. But the factory did not monitor the requirement for all employees to pay social security.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC <a href="#">ZAF600863168</a>



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

- 1. The factory provided payroll records from Apr 2024 to Feb 2025 for review.
  - 2. All employees' wages were calculated on monthly rate based on payroll review and worker's interview. Workers' legal minimum wages was RMB2490 per month (as RMB 14.31 per hour) since Jan 1, 2024. Based on payroll review and workers interview, all workers were paid above the legal minimum wage.
  - 3. The wages office was well organized with a good controlled set of processes which were understood by all employees.
  - 4. All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time that they were paid.
  - 5. All workers were paid at 30th of each month by bank transfer and each worker was given a pay slip and signed for their wages.
  - 6. Wages had been recorded according to documents review, no inconsistency on working hours was identified during the audit.
- Details:
- 1. Worker interview and management interview
  - 2. Local and national law
  - 3. Wages and benefits policy
  - 4. Local legal minimum wage documents
  - 5. Payroll records from Apr 2024 to Feb 2025 of all workers interviewed
  - 6. Resignation records
  - 7. Labour contracts for all employees
  - 8. Payslips of all workers interviewed
  - 9. Hours records to check hourly rates and any overtime premiums



# Findings: non-compliances

ZAF600863168		Non-compliance	Due 2024-07-10
<b>Code area</b> 5 Legal wages are paid	<b>Status</b> Open*		
<b>Workplace requirement</b> 5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.	<b>Time given to resolve</b> 90 days		
<b>Issue title</b> 423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	<b>Verification method</b> Follow up audit		
<b>Description</b> The factory did not provide 5 types of social insurance for all workers required by law. There were 19 workers at the factory, including 0 newly recruited and 2 retired workers. Based on the social insurance records of February 2025, 2 out of the 17 eligible workers (11.76%) participate in work-related injury, retirement, unemployment, medical and maternity insurances. And the factory purchased one commercial accident insurance for 21 employees with validity period from March 7, 2025 to March 7, 2026.  工厂没有按照法规要求给所有工人提供5种社保。工厂共有19名工人，其中包括0名新入职工人和2名退休工人。根据2025年2月的社保记录，工厂为17名符合参保条件的工人中的2名(11.76%)购买了工伤、养老、医疗、失业和生育保险。工厂为21名员工购买了商业意外险，有效期为2025年3月7日至2026年3月7日。	<b>Area of non-compliance/non-conformance</b> Local law Base code		
<b>Description (carried over)</b> The factory did not provide 5 types of social insurance for all workers required by law. There were 16 workers at the factory, including 0 newly recruited and 3 retired workers. Based on the social insurance records of February 2024, 13 eligible workers did not participate in work-related injury, retirement, unemployment, medical and maternity insurances, but the factory purchased one commercial accident insurance for all workers with validity period from March 8, 2024 to March 7, 2025. 工厂没有按照法规要求给所有工人提供5种社保。工厂共有16名工人，其中包括0名新入职工人和3名退休工人。根据2024年2月的社保记录，工厂没有为13名符合参保条件的工人购买工伤、养老、医疗、失业和生育保险，但为所有工人购买了商业意外险，有效期为2024年3月8日至2025年3月7日。			
<b>Corrective and preventative actions</b> The Factory should provide all the 5 types of social insurance including retirement insurance, maternity insurance, unemployment insurance, medical insurance and work-related injury insurance to all eligible workers. 工厂应给所有符合参保条件的工人提供所有 5 种社保，包含养老保险、生育保险、失业保险、医疗保险和工伤保险。			
<b>Corrective and preventative actions (carried over)</b> The Factory should provide all the 5 types of social insurance including retirement insurance, maternity insurance, unemployment insurance, medical insurance and work-related injury insurance to all eligible workers. 工厂应给所有符合参保条件的工人提供所有 5 种社保，包含养老保险、生育保险、失业保险、医疗保险和工伤保险。			



## Local law reference

Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing.

## Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

Timescales was confirmed by factory.

## Evidence

社会保险费申报表(适用单位缴费人)									
缴费人名称		缴费人识别号		缴费人地址		缴费人开户银行		缴费人开户账号	
基本养老保险	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费	基本养老保险费
基本医疗保险	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费	基本医疗保险费
失业保险	失业保险费	失业保险费	失业保险费	失业保险费	失业保险费	失业保险费	失业保险费	失业保险费	失业保险费
工伤保险	工伤保险费	工伤保险费	工伤保险费	工伤保险费	工伤保险费	工伤保险费	工伤保险费	工伤保险费	工伤保险费
生育保险	生育保险费	生育保险费	生育保险费	生育保险费	生育保险费	生育保险费	生育保险费	生育保险费	生育保险费
其他社会保险	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费	其他社会保险费
合计	合计	合计	合计	合计	合计	合计	合计	合计	合计

[Insufficient Insurance.jpg](#)



\* PDF generated at 07:51 (UTC) on 08 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.



## 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
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

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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### 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	
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	12.0
	Max hours per month	56.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2490.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	3500.0
Minimum legal overtime wage	Min per hour	21.47
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	30.17
	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 Feb 2025 (Current) 10 samples from Nov 2024 (Random) 10 samples from Jun 2024 (Random)
Are there different legal minimum/ legally recognised CBAs wage grades?	No



For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?	Above legal minimum
Indicate the breakdown of workforce per earnings	100.0% of workforce earning above minimum wage.
Are there any bonus schemes used?	No
Were accurate records shown at the first request?	Yes
Were any inconsistencies found?	No



## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	1.The factory reviewed workers' total pay yearly and compared it with a credible 'living wage' to calculate a 'living wage gap'.And the internal data included in the gap analysis matches the site's pay records made available to the auditor, and cover the entire workforce. 2. The factory made a wage improvement plan and used WageIndicator Typical Family Methodology to calculate living wage Details: 1.Living wage gap analysis record 2.Wage improvement plan		



## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Fundamental Improvements Required
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Working Hours Policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documents clearly assign responsibilities, processes in place and address all code areas, however, the details of implementation are unclear.</p> <p>2) Resources: A senior director is assigned responsibility, and he was aware of their responsibilities. In practice, however, the management structure systemically leads to active decisions made to contravene the Base Code Area, such as prioritizing lead times for complete customers, leading to gaps with the management structure. Also this role was taking responsibility for other management, not a dedicated role.</p> <p>3) Communication &amp; Training: All employees have received an internal training on working hours and overtime of training programs and have used their knowledge to develop effective processes in place. Regular communication channels, such as team meetings, bulletin boards, and internal messaging systems, are used to remind employees of the working hour limits and to update them on any changes in the schedule. Due to workers' incomprehension of the training content and incomplete communication, the training results are different from the ideal results.</p> <p>4) Monitoring: Adherence to the processes is monitored via departmental reporting to the Vice manager, adequate management of the work area cannot be ensured because of gaps with monitoring procedures.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC <a href="#">ZAF600863169</a>



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

- 1. The facility had established policies on working hours, workers could choose to work overtime or not freely.
  - 2. The factory provided the payroll records from Apr 2024 to Feb 2025 and attendance records from Apr 1, 2024 to the audit day for review.
  - 3. Workers used finger printer recognition attendance to record attendance time.
  - 4. According to time records and workers' interview, it was noted that the normal working hours of all workers were 8 hours per day and 40 hours per week. All departments run in one shift from Monday to Friday, five days a week. Daily working hours: 7:30-11:00, 12:00-16:30. If OT, from 17:30 to 19:30.
  - 5. Overtime working hour was based on product order. They often overtime worked 8 hours on Saturdays based on workers and management interview.
  - 6. No inconsistency on working hours was identified during the audit by cross checking with the production records and workers interviews.
- Details:
- 1. Employee interview
  - 2. Management interview
  - 3. Factory policy on working hours
  - 4. Sample pay slips with recorded hours all workers interviewed
  - 5. Workers contracts
  - 6. Attendance records from Apr 1, 2024 to the audit day of 10 sampled workers



# Findings: non-compliances

ZAF600863169	Non-compliance	Due 2024-07-10
<b>Code area</b> 6 Working hours are not excessive	<b>Status</b> Open*	
<b>Workplace requirement</b> 6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.	<b>Time given to resolve</b> 90 days	
<b>Issue title</b> 480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)	<b>Verification method</b> Follow up audit	
<b>Description</b> The monthly overtime of workers exceeded the legal requirements. Based on the attendance records from Apr 1, 2024 to the audit date, it was noted that the attendance findings of 10 sampled workers in Feb 2025 (current month), Nov 2024 (random month) and Jun 2024 (random month) were as follows: 1) 10 (selected from all workshops) sampled workers' monthly overtime hours in Feb 2025 (current month) not exceeded legal requirement of 36 hours, which were 26 hours in maximum; 2) 10 (selected from all workshops) sampled workers' monthly overtime hours in Nov 2024 (random month) exceeded legal requirement of 36 hours, which were 50 hours in maximum; 3) 10 (selected from all workshops) sampled workers' monthly overtime hours in Jun 2024 (random month) exceeded legal requirement of 36 hours, which were 56 hours in maximum.  员工的月加班时间超过法规要求。 根据工厂提供的从2024年4月1日至审核当日的考勤记录中分别抽取2025年2月（当前月），2024年11月（随机月）和2024年6月（随机月）的各10名抽样员工的考勤发现： 1) 在2025年2月（当前月）10名抽样员工（来自所有车间）的月加班时间未超过法规要求的36小时，最大为26小时； 2) 在2024年11月（随机月）10名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为50小时； 3) 在2024年6月（随机月）10名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为56小时。	<b>Area of non-compliance/non-conformance</b> Local law Base code	
<b>Description (carried over)</b> The monthly overtime of workers exceeded the legal requirements. Based on the attendance records from March 2023 to the audit date, it was noted that the attendance findings of 10 sampled workers in February 2024 (current month), December 2023 (random month) and April 2023 (random month) were as follows: 1) 10 (selected from all workshops) sampled workers' monthly overtime hours in February 2024 (current month) did not exceed legal requirement of 36 hours, which were 26 hours in maximum; 2) 10 (selected from all workshops) sampled workers' monthly overtime hours in December 2023 (random month) exceeded legal requirement of 36 hours, which were 58 hours in maximum; 3) 10 (selected from all workshops) sampled workers' monthly overtime hours in April 2023 (random month) exceeded legal requirement of 36 hours, which were 56 hours in maximum. 员工的月加班时间超过法规要求。根据工厂提供的从2023年3月至审核当日的考勤记录中分别抽取2024年2月（当前月），2023年12月（随机月）和2023年4月（随机月）的各10名抽样员工的考勤发现：1) 在2024年2月（当前月）10名抽样员工（来自所有车间）的月加班时间没有超过法规要求的36小时，最大为26小时；2) 在2023年12月（随机月）10名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为58小时；3) 在2023年4月（随机月）10名抽样员工（来自所有车间）的月加班时间超过法规要求的36小时，最大为56小时。		
<b>Corrective and preventative actions</b> The factory should ensure OT hours comply with legal requirement. 工厂应确保加班时间符合法规要求。		



Corrective and preventative actions (carried over)

The factory should ensure OT hours comply with legal requirement. 工厂应确保加班时间符合法规要求。

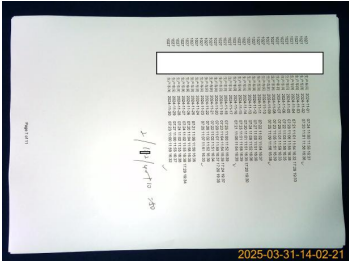
Local law reference

Labor Law of the People’s Republic of China (2018 Amendment), Article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

Explanation of difference in resolution time or verification method from the SMETA issue title recommendation

Timescales was confirmed by factory.

Evidence



[Monthly overtime exceeded 36h.jpg](#)

\* PDF generated at 07:51 (UTC) on 08 Apr 2025. [View this finding on the Sedex platform](#) for live updates and closure details.



## 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?	Not applicable
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?	52.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	52.0
Maximum number of days worked without a day off in sample	6



## 7. No discrimination is practiced

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures: The factory's Prevention of forced labor, discrimination, and harassment control procedures in place to manage this issue at the site includes all relevant requirements of the code area, such as that there will be no discrimination based on factors such as race, gender, age, religion, disability, or national origin in any employment - related decision, including hiring, promotion, training, and termination. The procedures for handling discrimination complaints are well - defined. And further detail can be found in the 'Recruitment and Onboarding' procedure. The policy also stipulates strict sanctions for those found guilty of discriminatory acts to deter such behavior within the organization. But current policy was not mentioned the diversity and Inclusion policy clearly.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. Specialized staff are trained to handle discrimination cases, including conducting investigations and providing support to affected employees. The senior director has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory. But this role was also taking responsibility for other management, not a dedicated role.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training and verified the effectiveness of the training. These training programs cover topics such as understanding different forms of discrimination, the impact of discriminatory behavior on individuals and the organization. The factory uses posters to communicate the anti - discrimination policy and any updates. But no dedicated training for diversity and Inclusion was provided yet.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, any signs of potential discrimination are investigated promptly. But the monitoring for diversity and Inclusion was not covered.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
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No findings

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

1. Base on workers interview and payroll review, the female worker or male worker's wages were calculated at the same rate if they engaged for the same work.
  2. All workers said they were treated fair despite of their native place, sex, age and so on.
  3. No worker was required to do the examination of the hepatitis B virus or HIV.
  4. There was no evidence of sexual harassment.
  5. The factory has established a reasonable and transparent system for recruitment, training, development, and promotion, allowing employees to improve their positions and benefits based on their experience and time.
- Details:
1. The hiring and termination procedure
  2. Leave application records and employee handbook
  3. Labour contract
  4. Termination records
  5. Attendance and payroll records
  6. Training records
  7. Worker interview and management interviewa



## 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)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	23%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	
Three most common nationalities in managerial and supervisory roles	Chinese



## 8. Regular employment is provided

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Human Resource Management Procedure outlining the systems in place to manage this issue at the site includes all relevant requirements, such as defines the types of employment contracts offered with details regarding job security and renewal conditions. The procedures for hiring are streamlined and transparent, with a clear selection process that emphasizes fairness.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. But this role was also taking responsibility for other management, not a dedicated role. The senior director has received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training, such as comprehensive training programs for new hires to ensure they can quickly adapt to their roles and perform well. and verified the effectiveness of the training.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively. If any issues are identified, such as potential overwork or underutilization of staff, corrective actions are taken promptly.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. The factory had established the policy of the recruitment process and the management was fully understood of the entire recruitment process.
2. The factory understood the entire recruitment process and assessed all labour recruiters and intermediaries against legal and ethical requirements.
3. All permanent workers were recruited by the factory directly. No temporary worker, apprenticeship schemes or home worker was identified.
6. Workers did not pay recruitment fee at any stage of the recruitment process.
7. The factory signed labour contracts with all employees and kept one copy of labour contract in the factory and issued one copy to each worker. Workers' contracts accurately reflect the agreed payment and terms in the recruitment process and were understood and signed by workers.

**Details:**

1. Recruitment policy
2. Hiring and termination practices
3. Personal files and labour contracts
4. Payroll records and attendance records were provided for review



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%



## 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	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Supplier and subcontractor management regulations 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.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, and aware of the responsibilities. But this role was also taking responsibility for other management, not adedicated role.</p> <p>The senior director trained staff members who are knowledgeable about subcontracting best practices, ready to handle the process if it becomes necessary.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training and verified the effectiveness of the training. This includes internal training sessions and announcements during team meetings to ensure that everyone understands the factory's position.</p> <p>4) Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively. In the case of homeworkers, the factory has systems in place to monitor the distribution of work tasks to ensure that none are being sent outside the factory premises.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. No home-worker was used by the factory per management interview and on-site observation.
  2. A site tour showed that all production processes were present in the factory.
  2. No subcontractor was used by the factory.
- Details:
1. No homeworking identified.
  2. Management interview
  3. Site tour (Calculation on total production and estimated capacity)
  4. Materials in/out records
-



## 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  
The factory's suppliers were not used homeworkers.

### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
The factory had established social accountability manual including sub-contracting control procedure.

Are any sub-contractors used? No



## 9. No harsh or inhumane treatment is allowed

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	<p>1) Policies &amp; Procedures: The factory's Employee 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.</p> <p>2) Resources: A senior director is assigned responsibility for implementation alongside an operations manager, and both are aware of their responsibilities. But this role was also taking responsibility for other management, not a dedicated role. They have received a high level of internal training on Fair treatment and employee grievance and have used their knowledge to develop effective processes in place.</p> <p>3) Communication &amp; Training: All employees 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.</p> <p>4) Monitoring: Adherence to the processes is monitored via departmental reporting to the vice manager, and the factory has established a complete mechanism to verify implemented by operational staff.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			



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

- 1.No negative evidence of mental / physical coercion was identified during the audit.
  - 2.There was no evidence of sexual harassment.
  - 3.The workers interviewed said they never witnessed any cases of physical abuse or discipline, sexual or other harassment and verbal abuse or other forms of intimidation existed in this factory.
  - 4.The duties of security guards were to protect safety of factory's property, to regularized entrance/exit of goods/ vehicles/ employees/ visitors.
- Details:
1. Social responsibility manual: the factory had established social responsibility manual, including forbidden mental / physical coercion procedure.
  2. Factory rules.
  3. Security guard regulation. The duties of security guards were to protect safety of factory's property, to regularized entrance/exit of goods/ vehicles/ employees/ visitors.



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?	Hotline and suggestion box were available
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0



## 10.A. Environment 2-Pillar

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Some Improvements Recommended
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures: The factory's Health&amp;Safety and Environmental 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. But current environmental policy did not mention any commitment or goal to climate change.</p> <p>2) Resources: A senior director is assigned responsibility for implementation alongside an operations manager, and both are aware of their responsibilities. But this role was also taking responsibility for other management, not a dedicated role. They have received a high level of internal training on Fair treatment and employee grievance and have used their knowledge to develop effective processes in place.</p> <p>3) Communication &amp; Training: All employees 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 employees informed about environmental goals, initiatives, and any updates to policies or procedures. But the training program was lack of sustainable development and climate change topics.</p> <p>4) Monitoring: Adherence to the processes is monitored via departmental reporting to the vice manager, and the factory conducted regular environmental audits to ensure compliance with internal policies and external regulations. Based on the monitoring results, the factory makes necessary adjustments to its environmental system, whether it's implementing new technologies, modifying procedures, or providing additional training. But the monitoring for its impact to climate change was not carried out yet.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			



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

1. The factory has established environmental protection procedure.
  2. Environment training records review, the factory conducted environment training for workers when entering the factory.
  3. Mr. Cai Zhihui/General Manager is a person in charge who oversees the environment area in place. The facility management maintained all legally required environmental policy.
- Details:
1. Environmental policy
  2. Onsite observation



## 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 did not have these 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



## 10.B. Environment 4-Pillar

### Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	1.Environment training records review, the factory conducted environment training for workers when entering the factory. 2.The factory provided the fixed pollution source discharge registration during the audit. Details: 1. Environmental emergency plan 2. Environmental protection training records 3. EIA training records 4. Worker and management interviews 5. Site tour		



## 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 Packaging optimization
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes This was included in the site's internal management system.
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 established a system to monitor business partners about environmental performance of the facility.

### Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non-renewable sources (kWh)	83,600	84,689
Total electricity consumption from renewable sources (kWh)	0	0
Sources of renewable energy used	None	None
Types of renewable energy used	Data not available	Data not available
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	local water authority	local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	60	60
Water discharged	Municipal pipe network	Municipal pipe network
Water volume discharged (m3)	60	60
Water volume recycled (m3)	0	0
Total waste produced (mt)	2	2
Total hazardous waste produced (mt)	0	0
Waste to recycling (mt)	0	0
Waste to landfill (mt)	0	0
Waste to other (mt)	2	2
Total product produced (mt)	600	600



## 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	Some Improvements Recommended
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	Some Improvements Recommended
Explanation for management systems grades	<p>1) Policies &amp; Procedures: The company 'Business Ethics' policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area, such as honesty and integrity in fair transactions, respect for intellectual property rights. Procurement procedures are designed to ensure fairness and transparency, with clear guidelines for selecting suppliers based on quality, price, and ethical practices.</p> <p>2) Resources: A senior director is assigned responsibility for implementation, but this role was also taking responsibility for other management, not a dedicated role. The individual is trained in business ethics and has the authority to investigate any ethical concerns.</p> <p>3) Communication &amp; Training: All employees have done a series of relevant training and repeated periodically to reinforce ethical concepts. But current training program did not cover antitrust and fair competition.</p> <p>4) Monitoring: Adherence to the processes is monitored via departmental reporting to the vice manager, and the factory has established a complete mechanism to verify implemented by operational staff. Based on the monitoring results, the factory makes necessary adjustments to its policies, training programs, and other aspects of the business ethics system to ensure its continued effectiveness. But current monitoring system did not cover antitrust and fair competition.</p>

### Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings



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

1. The factory had established a system to monitor Business Ethics standards against relevant laws and customers' requirements.
  2. The factory had an adequate transparent system in place for confidentially reporting and dealing with bribery, corruption, and unethical Business Practices.
  3. The factory had provided the training to the workers who were worked in the high risky job of business ethics.
- Details:
1. The company business ethics policy including Bribery and Corruption
  2. Training records
  3. Worker handbook
  4. Reports from Anonymous email account



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	The factory did not have such certificate.



# Attachments



[SMETA-JSASCN25947299-  
NINGBO TAPE INDUSTRIAL  
CO LTD-Mar 31,2025-  
Annual-Photo Report.pdf](#)



[SMETA-JSASCN25947299-  
NINGBO TAPE INDUSTRIAL  
CO LTD-Mar 31,2025-  
Annual-Onsite CAP.pdf](#)







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