
Auditee :	SkyRC Technology Co., Ltd.
Audit Date From :	07/12/2018
Audit Date To :	07/12/2018
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	BureauVeritas
Auditor's Name(s) :	Jimmy Sun, Danny Xu(Lead)
Auditing Branch (if applicable) :	



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform.
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Rating Definitions



Rating	A combination of ratings per Performance Area where:	Consequence																																							
A Very Good	- Minimum 7 Performance Areas rated A - No Performance Areas rated C, D or E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr></table>	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	B	B	B	A	A	A	A	A	A	A	B	B	B	B	B	B	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
A	A	A	A	A	A	A	A	A	A	A	A	A																													
A	A	A	A	A	A	A	A	A	A	B	B	B																													
A	A	A	A	A	A	A	B	B	B	B	B	B																													
B Good	- Maximum 3 Performance Areas rated C - No Performance Areas rated D or E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td></tr><tr><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td></tr></table>	A	A	A	A	A	A	B	B	B	B	B	B	B	A	A	A	A	A	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	C	C	C	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
A	A	A	A	A	A	B	B	B	B	B	B	B																													
A	A	A	A	A	B	B	B	B	B	B	B	C																													
B	B	B	B	B	B	B	B	B	B	C	C	C																													
C Acceptable	- Maximum 2 Performance Areas rated D - No Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>C</td><td>C</td><td>C</td><td>C</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td></tr><tr><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td></tr></table>	A	A	A	A	A	A	A	A	A	C	C	C	C	A	A	A	A	A	B	B	B	B	C	C	C	D	C	C	C	C	C	C	C	C	C	C	C	D	D	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
A	A	A	A	A	A	A	A	A	C	C	C	C																													
A	A	A	A	A	B	B	B	B	C	C	C	D																													
C	C	C	C	C	C	C	C	C	C	C	D	D																													
D Insufficient	Maximum 6 Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td></tr><tr><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td><td>E</td></tr><tr><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr></table>	A	A	A	A	A	A	A	A	A	A	D	D	D	A	A	A	B	B	B	C	C	C	D	D	D	E	D	D	D	D	D	D	D	D	E	E	E	E	E	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
A	A	A	A	A	A	A	A	A	A	D	D	D																													
A	A	A	B	B	B	C	C	C	D	D	D	E																													
D	D	D	D	D	D	D	D	E	E	E	E	E																													
E Unacceptable	Minimum 7 Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr><tr><td>A</td><td>A</td><td>B</td><td>B</td><td>C</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr><tr><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr></table>	A	A	A	A	A	A	E	E	E	E	E	E	E	A	A	B	B	C	D	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
A	A	A	A	A	A	E	E	E	E	E	E	E																													
A	A	B	B	C	D	E	E	E	E	E	E	E																													
E	E	E	E	E	E	E	E	E	E	E	E	E																													
Zero Tolerance	A Zero Tolerance Issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)	Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.																																							

Main Auditee Information

Name of producer :	SkyRC Technology Co., Ltd.		
DBID number :	385371		
Audit ID :	139717		
Address :	4, 5, 8 Floor, Building No. 4, Meitai Industry Park, Guanguang Road, Gui Hua Community, Guanlan Street, Longhua District Shenzhen		
Province :	Guangdong	Country :	China
Management Representative :	Xilong Shen		
Contact person:	Xilong Shen	Sector :	Non-Food
Industry Type :	Others	Product group :	Others
Product Type :	Charger, Power Supply, Speed Controller, Motor, Pet Feeder, Pet Fountain, Home Automation Device		

Audit Details


Audit Range :	☒ Full Audit	☐ Follow-up Audit
Audit Scope :	☒ Main Auditee	☐ Main Auditee & Farms
Audit Environment :	☒ Industrial	☐ Agricultural ☐ Small Producer
Audit Announcement :	☒ Fully-Announced	☐ Fully-Unannounced ☐ Semi-Announced
Random Unannounced Check (RUC) :	No	
Audit extent (if applicable) :	none	
Audit interferences or contingencies (if applicable) :	none	
Overall rating :	C	
Need of follow-up :	Yes	If YES, by : 07/12/2019

Rating per Performance Area (PA)

PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
C	A	A	A	A	D	A	A	A	A	A	A	B

Executive summary of audit report

Ms. Zhang Mei Ling/HR Manager, Mr. Shen Xi Long/Production Director, Ms. Zhu Li Jun/Worker Representative joined the opening meeting.

The factory was established on July 24, 2008 and specialized in the manufacture of Charger, Power Supply, Speed Controller, Motor, Pet Feeder, Pet Fountain and Home Automation Device. Business license number was 91440300674841949P. Factory name in English was SkyRC Technology Co., Ltd. Factory name on business license was “天空创新科技(深圳)有限公司”. Factory address in English was 4, 5, 8 Floor, Building No. 4, Meitai Industry Park, Guangang Road, Gui Hua Community, Guanlan Street, Longhua District, Shenzhen. Factory address on business license was “深圳市龙华区观澜街道桂花社区观光路旁美泰科技园4号厂房4、5、8层”. The factory occupied the 4th floor, 5th floor and 8th floor of one 8-storey production building (the 1st, 2nd, 3rd, 6th and 7th floor were occupied by other factories). No dormitory or canteen was provided to employees. Total construction area of the factory was about 9000 square meters.

The main produce processes included SMT, inserting, spot welding, assembling, testing and packing. There were a total of 244 employees with 174 production workers and 70 non-production staffs hired by the factory. In addition, no outsourced employees worked in the factory. The youngest employee noted during this audit was 19 years old. According to factory management, the peak season was not obvious.

The factory used finger printing attendance system to record working hours of employee. The factory normal working hours were 8 hours per day. There was one shift for employees working in the office, the details were as below: 09:00 to 11:50, 12:50 to 18:00. In addition, there were 3 shifts for the security guards hired by the factory, and the details were as below: 08:00 to 16:00, 16:00 to 24:00 and 24:00 to 08:00. And there was one shift for employees working in workshop: 08:00 to 11:30, 13:00 to 17:30.

Wages of employee were paid before 12th of each following month by cash with wage stubs issued to employees and the employees' signatures on the payrolls. Per payroll review and interviews with management and employees, employees were paid by hourly rate.

During the audit, 50 employees' time records and payrolls were sampled as follows for working hour and wage testing: 15 sample employees from current paid month October 2018, 15 sample employees from June 2018 and 15 sample employees from month of February 2018; besides, auditor selected 5 sampled employees' time records from the current time completed month November 2018. It was noted that sampled employees were paid at least RMB 12.65 per hour since August 1, 2018 or RMB 12.25 per hour since June 1, 2017, which met the local minimum wage standard of RMB 12.64 per hour since August 1, 2018 or RMB 12.24 per hour since June 1, 2017. And all sampled employees were paid 150%, 200% and 300% of normal wages for the overtime worked on weekdays, weekends and statutory holiday respectively in the test period, which met the legal overtime compensation rate. Sample population employees worked at most 80 overtime hours per month, 2 overtime hours per day, 58 hours per week, and could receive at least one day off per seven day period.

According to the social insurance payment receipt provided by factory management, it was noted that 244 out of 244 employees (100%) were provided with accident and pension insurance, 242 out of 244 employees (99.18%) were provided with maternity and medical insurance, 215 out of 244 employees (88.11%) were provided with pension insurance in November 2018.

Further, 15 employees were selected for private interviews from different workshops. No negative comment was issued during employee interviews. Interviewed employees were satisfied with the working environment, compensation, working hour and management team in the factory.

During closing meeting, auditor provided the factory representatives with a general overview and explained all of the findings to them. Mr. Shen Xi Long/Production Director, Ms. Zhu Li Jun/Worker Representative signed the CAPR.

Remark:

1. During this audit, as per factory tour, auditor noted that another five factories named Shen Zhen Zhong Shi Ji Xie She Bei Co., Ltd. (it occupied the 1st floor), Shen Zhen City Bi Ke Dian Chi Co., Ltd. (it occupied the 2nd floor), Shen Zhen City Rui Long Yuan Dian Zi Co., Ltd. (it occupied the 3rd floor), Shen Zhen City Tai Ge Er Hu Wai Yong Pin Co., Ltd. (it occupied the 6th floor), and Shen Zhen City Jin Tai Ke Ban Dao Ti Co., Ltd. (it occupied the 7th floor)

were located within the same boundary with audited factory. As per the document review, it was noted that all of factories had their own business license and different corporate representative. The audited factory's management stated that they are independent factories and did not share any attendance & wage system or HR system. As per factory tour, auditor noted that all of factories had their own access control system. As per employee interview, employees from these factories stated that they never worked in another factories or saw anyone from another factories worked in their factory. In addition, the working hours and wages were managed and paid by their own factory. As per factory tour, document review, management and employee interview, it was confirmed by auditors that these factories are individual factories and did not share any attendance & wage system or HR system. Thus, the other 5 companies were not included in this audit.

2. There were no agencies used by the auditee, which made the agency labor contract not applicable. No Government Waivers or Collective Bargaining Agreements was available.

3. The audit was actually completed by 3 auditors Danny Xu (leader), Jimmy Sun and Sophia He (members). Since Sophia He has not yet on the list of auditors of BSCI platform, only auditors Danny Xu and Jimmy Sun were selected in BSCI platform.

Ratings Summary


Auditee's background information			
Auditee's name :	SkyRC Technology Co., Ltd.	Legal status :	Limited Company
Local Name :	天空创新科技(深圳)有限公司	Year in which the auditee was founded :	2008
Address :	4, 5, 8 Floor, Building No. 4, Meitai Industry Park, Guanguang Road, Gui Hua Community, Guanlan Street, Longhua District	Contact person (please select) :	Xilong Shen
Province :	Guangdong	Contact's Email :	sxl@skysrc.cn
City :	Shenzhen	Auditee's official language(s) for written communications :	Mandarin
Region :	North East Asia	Other relevant languages for the auditee :	None
Country :	China	Website of auditee (if applicable) :	None
GPS coordinates :	N22°43'53"; E114°2'40"	Total turnover (in Euros) :	9000000.00
Sector :	Non-Food	Of which exports % :	70.00
Industry :	Others	Of which domestic market % :	30.00
If other, please specify :		Production volume :	55000 pieces per month
Product Group :	Others	Production cost calculation :	Yes
If other, please specify :		Lost time injury calculation cost :	No
Product Type :	Charger, Power Supply, Speed Controller, Motor, Pet Feeder, Pet Fountain, Home Automation Device		

Auditee's employment structure at the time of the audit		
Total number of workers :	244	Total number of workers in the production unit to be monitored (if applicable) :
	MALE WORKERS	FEMALE WORKERS
Permanent workers	124	120
Temporary workers	0	0
In management positions	14	4
Apprentices	0	0
On probation	0	0
With disabilities	0	0
Migrants (national citizens)	112	102
Migrants (foreign citizens)	0	0
Workers on the permanent payroll	124	120
Production based workers	0	0
With shifts at night	5	1
Unionised	0	0
Pregnant	-	0
On maternity leave	-	0

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: C

Deadline date:07/09/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the partial respected the requirement of this performance area. Per document review, management interview and employees' private interview, it was noted that the main auditee had established social compliance management policies, procedures, manuals and organization structure to implement BSCI code of conduct. The main auditee had communicated the BSCI code with its significant suppliers by providing the copy of BSCI code of conduct to them. However, gaps were identified in implementation.

整体观察表明,受审核方部分满足这个PA的要求。通过文件查阅、管理层访谈和员工访谈,审核发现工厂建立了社会责任管理方针,程序,手册及组织架构来执行BSCI行为规范。工厂将BSCI行为准则发送给了其重要供应商并在遵守行为准则方面进行了沟通。但在实际执行中这个PA仍存在问题。

- 1.4 -** The factory did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit. BSCI Code of Conduct: The auditee should organize its workforce capacity to meet the expectations of the delivery order and/or contracts. Employees could refuse to work for overtime freely, without penalty. Employees were compensated with overtime wage in accordance with legal requirement. Factory management represented that they would take corrective action as soon as possible.

审核发现工厂没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期,以至于员工月加班超出法律规定。BSCI行为守则:被审核方(生产商)组织其劳工来达成交付订单和/或合同预期和要求。员工可以自由地拒绝加班工作,没有被处罚。工厂按照法规要求支付了加班费。工厂表示会尽快做出整改

Remarks from Auditee:

None

Performance Area 2 : Workers Involvement and Protection

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A

Deadline date:07/01/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The main auditee partially respects this principle because: The auditee had updated worker complaint management procedure and worker representative election procedure in 2018, and worker representatives were selected by the workers in 2018, communication meeting between management and worker representatives meeting was conducted regularly. According to interview with worker representative and workers, they were familiar with workplace-related issues, their labor right e.g. the law, work contracts, job description, working rules, the factory also provided on-board training on workers' right to workers. It had been noted that the auditee had an effective grievance mechanism: the mechanism consisted of using suggestion boxes, worker representatives and an open door policy on coming up with suggestion directly to workers' supervisor. It was confirmed through review the documentation and interview with workers. However, minor gap was identified in implementation.

被审核方部分尊重BSCI的本条原则,原因是:工厂已建立了员工投诉管理程序和员工代表选举程序,工人在2018年选举了员工代表,管理层和员工代表定期举行沟通会议,根据工会代表及员工的访谈信息,员工代表以及员工都很清楚工厂场所相关信息,以及员工的劳工权利,例如劳动法,劳动合同,工作描述以及厂纪厂规等。同时工厂会给员工提供关于员工权利的入职培训。审核过程发现,工厂已建立了申诉系统,员工可通过意见箱,员工代表或直接和主管进行沟通等方式提供投诉。所有这些过程均通过文件以及访谈来核实。但工厂在BSCI体系执行上仍存在较小差距。

- 2.5 -** It was noted that the factory had established or participated in an effective grievance mechanism for individuals, the grievance mechanism allowed worker to lodge suggestions or complaints related to the workers' rights, and individuals had alternative ways for lodging a complaint, such as through suggestion box, worker representative or directly to the management. However, the factory had not set up a channel for local communities' coming up with its suggestions or complaints to management for improvement. BSCI Code of Conduct: The auditee establishes or participates in an effective grievance mechanism for individuals and communities. Factory management represented that they would take corrective action as soon as possible.

审核员发现工厂建立和参与了有效的个人申诉机制,申诉机制赋予了工人提出建议,投诉的权利,并且开放了可替代的投诉方式,例如通过意见箱,工人代表或直接向管理层投诉。但是,工厂尚未创建给当地社区提供申诉的渠道。BSCI行为守则:被审核方(生产商)建立或参与了有效的个人和团体申诉机制。工厂表示会尽快做出整改。

Remarks from Auditee:

None

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The main auditee fully respects this principle because: Written policy on freedom of association and collective bargaining was established, and communicated to all workers by training. The worker representatives were selected by workers. The interviewed workers confirmed that the auditee respected their right to freely elect their representatives. Right of association or collective bargaining was not restricted. 被审核方完全尊重BSCI的本条原则, 原因是: 被审核方建立了自由结社及集体谈判的书面政策, 通过培训的方式传达给了所有员工。被访谈的员工确认工厂尊重员工自由选举了员工代表的权利。自由结社和集体谈判的权利未受到限制。	
Remarks from Auditee: None	
Performance Area 4 : No Discrimination	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The main auditee fully respects this principle because: No discrimination was noted in the factory, the auditee had established Non-discrimination policy and procedure. During worker interviews, it was found that there was no unequal, abuse, unusual disciplinary practices, and there were no preference on the religion, origin, political affiliation or age, gender or social background. 被审核方完全尊重BSCI的本条原则, 原因是: 工厂未发现歧视, 被审核方已建立了禁止歧视政策和管理程序。访谈中员工反映在被审核方工厂里, 没有不平等, 虐待, 不寻常的纪律处分, 且没有对宗教, 出身, 政治派别或年龄, 性别或社会背景有偏见。	
Remarks from Auditee: None	
Performance Area 5 : Fair Remuneration	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:07/09/2019
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The overall observation showed that the factory partial respected the requirement of this performance area. Per document review, management interview and employees' private interview, it was noted that the local legal minimum wage standard was RMB 12.64 per hour since August 1, 2018. All the employees were paid above minimum wage standard (at least RMB 12.65 per hour). Wages were paid by cash before 12th of the following month according to legal requirement; employees would make a signature in the wage records which was also cross verified during worker's interview. No illegal or unreasonable deduction had been identified through document review or reported by the interviewed workers. However, gaps were identified in implementation. 整体观察表明, 受审核方部分满足这个PA的要求。通过文件查阅、管理层访谈和员工访谈, 审核发现当地法定最低工资标准是在2018年8月1日之后是12.64元/时。所有员工工资都满足了该标准(至少人民币12.65元/时)。每月工资在下个月12号前以现金的方式发放。员工有在工资表上签字(在员工访谈中对上述事实进行了交叉验证)。通过员工访谈及记录查询没有发现任何形式的不合理扣款。然而在实际执行中仍存在一些差距。 5.5 - According to the social insurance payment receipt provided by factory management, it was noted that 244 out of 244 employees (100%) were provided with accident and pension insurance, 242 out of 244 employees (99.18%) were provided with maternity and medical insurance, 215 out of 244 employees (88.11%) were provided with pension insurance in November 2018. In accordance with Article 73 of the Labor Law of the People's Republic of China No social insurance waiver was obtained. No evidence proof that the insufficient coverage of social insurance was caused by the employees' unwillingness to participate in the program. Local government department did not mandatorily require factory provided all five types of social insurance to all employees. Factory management represented that they would take corrective action as soon as possible. 审核员发现工厂的社会保险覆盖不足。根据厂方提供的2018年11月社会保险缴费单据显示工厂为244/244名员工(100%)购买了工伤和失业保险, 为242/244名员工(99.18%)购买了生育和医疗保险, 215/244名员工(88.11%)购买了养老保险。根据《中华人民共和国劳动法》第73条 工厂没有获得任何社保证明。没有记录显示员工不愿意购买社保。当地政府部门没有强制要求工厂为所有员工购买所有五种保险。工厂表示会尽快做出整改。	
Remarks from Auditee: None	

Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: D

Deadline date:07/09/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The main auditee partially respects this principle because: The factory made a policy of working hour system and controlled working hours. According to the policy and implementation records, workers worked 8 hours per day, 5 days per week. The factory arranged workers working on normal day extension and saturday, workers had right to choose working overtime or not. All this processes and implementation can be verified by interview and document review. Factory admitted that they were unable to control the overtime hours within local law limit, but they had clearly communicated working hour policy to all employees through employee handbook. Interviewed employees confirmed that they could choose to overtime working or not.

被审核方部分尊重BSCI的本条原则, 原因是: 工厂制定了工时政策, 依照政策以及工厂实际的执行情况, 员工每天上班8小时, 每周5天。工厂会安排工人在晚上和周六加班, 员工可自愿选择是否加班。以上均已从员工访谈以及文件信息等方面进行核实。工厂承认目前无法完全做到加班时间控制在法律规定范围内, 但是, 工厂会通过员工手册向员工传达了工厂关于工作时间的政策。面谈的员工证实加班是自愿的。

6.2 - It was noted that 48 out of 50 sample population employees worked in excess of the statutory overtime hour limits. A review of 50 sample population employees' time records (15 sample employees from current paid month October 2018, 15 sample employees from June 2018 and 15 sample employees from month of February 2018), besides, auditor selected 5 samples from the current time completed month November 2018 yielded the following: a) 14 out of 15 sample population employees' monthly overtime in February 2018 reached 38 hours; b) 15 out of 15 sample population employees' monthly overtime in June 2018 reached 40-80 hours; c) 14 out of 15 sample population employees' monthly overtime in October 2018 reached 72 hours; d) 5 out of 5 sample population employees' monthly overtime in November 2018 reached 76 hours, which exceeded the legal limit of 36 hours per month. In accordance with Article 41 of the Labor Law of the PRC Employees could refuse to work for overtime freely, without penalty. Employees were compensated with overtime wage in accordance with legal requirement. Factory management represented that they would take corrective action as soon as possible.

审核员从厂方提供的考勤记录中抽取50个样本(从最近工资支付月2018年10月, 从2018年6月, 从2018年2月各抽取15个样本), 另外从考勤完整工资未发月2018年11月抽取5名, 发现共有48名员工加班时间超出了法定标准, 具体为: a) 14/15名抽样员工在2018年2月的加班时间为38小时, b) 15/15名抽样员工在2018年6月的加班时间为40-80小时, c) 14/15名抽样员工在2018年10月的加班时间为72小时, d) 5/5名抽样员工在2018年11月的加班时间为76小时, 超过每月加班时间不能超过36小时的法律规定。根据《中华人民共和国劳动法》第41条。员工可以自由地拒绝加班工作, 没有被处罚。工厂按照法规要求支付了加班费。工厂表示会尽快做出整改。

Remarks from Auditee:

None

Performance Area 7 : Occupational Health and Safety

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A

Deadline date:07/06/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The main auditee partially respects this principle because: The committee of health and safety was set up by the factory. There was a designated person responsible for the affairs of health and safety. And the factory had assessed the risk of workshop. For fire safety, the factory ensured enough extinguishers, hydrants, emergency light and fire alarm in the workshop. All these facilities of fire safety were checked monthly. For mechanism safety, all processes of operation were set up, and workers were well trained to operate it correctly. According to the interviewee statement, workers understood the risk of mechanism. And the factory also set up emergency procedure and adequate trained first aiders for providing the service of first aid. The first aid kit was also available in the workshop. Clean potable water was also provided, the factory conducted water test regularly. However, gaps were identified in implementation.

被审核方部分尊重BSCI的本条原则,原因是:工厂创建了员工的健康安全委员会,由指定人员负责整体的健康与安全。工厂按照车间情况对工厂内部进行了健康安全风险评估。同时工厂给车间配备了足够的消防设施,例如灭火器,消防栓,应急灯,消防警铃等,并且工厂每月都会进行检查。在机械安全方面,工厂针对有机械安全风险的岗位都制定了相应的操作规程,并且给员工提供了培训以防范这方面的风险。在急救政策方面,工厂制定了急救政策,工厂给每个车间配备了药箱,而且工厂内有足够急救员。同时,工厂也提供了饮用水给员工,员工可随时喝水,且工厂定期检测饮用水保证了饮用水的安全卫生。但工厂在BSCI体系执行上仍存在差距。

7.5 - It was noted that the factory provided the occupational health checks to employees in workshop who were in contact with hazardous materials (e.g. noise, dust and Hexane) yearly. However, the occupational health checks were not provided to employees before they take the posts or leave the posts. In accordance with Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases. Without occupational health checks of before employees take the posts or leave the posts, occupational diseases may not detected timely and harmful to employees' health. Factory management stated that they would take improvements as soon as possible.

审核员发现厂方有每年为在车间接触有毒有害物质(例如:噪声,粉尘,正己烷等)的员工提供职业病体检,但工厂并没有组织这些员工在上岗前和离岗时进行职业病体检。根据《中华人民共和国职业病防治法》第35条。由于缺少上岗前或离岗时职业健康检查,员工的健康情况未能有效保护。厂方反映将尽快改善。

7.6 - It was noted that 4 out of 4 workers in the workshop on the 4th floor who was in contact with glue were not wearing rubber gloves. This violated Article 42 of Law of the People's Republic of China on Production Safety. Employees who in contact with hazardous material were not wearing properly PPE might affect the health of body. Factory management represented that they will take improvement as soon as possible.

审核发现4楼4名接触胶水的工人没有佩戴橡胶手套。违反《中华人民共和国安全生产法》第42条。接触胶水的员工没有佩戴橡胶手套会对身体健康造成影响。工厂管理层表示将尽快改善。

7.11 - 1. It was noted that the factory management was unable to provide the report of inspection for completed building construction project for factory building for review. The completed date was 2005. In accordance with Article 61 of Construction Law of the People's Republic of China The factory management indicated that the factory building was rented and the landlord did not provide for the original document to them. Per onsite observation, no crack was found in the building. Factory management also represented that they would take corrective action as soon as possible. 2. It was noted that the factory management was unable to provide the origin document of certificate of inspection for completed building construction project for factory building for review, but they could provide the copy one for review. The completed date was 2005. In accordance with Article 49 of Regulation on the Quality Management of Construction Projects, The factory management indicated that the factory building was rented and the landlord did not provide for the original document to them. Per onsite observation, no crack was found in the building. Factory management also represented that they would take corrective action as soon as possible. 3. It was noted that the factory management was only able to provide the copy fire acceptance check for factory building but not the original one for review. In accordance with Article 13 of the Construction Project Fire Safety Supervision and Management Regulation; and in accordance with Article 24 of the Construction Project Fire Safety Supervision and Management Regulation (Extract) The factory management indicated that the factory building was rented and the landlord was only able to provide the copy one for them. The lease contract was also provided for review. Per onsite observation, the factory has equipped with sufficient and valid fire-fighting equipment (including fire hydrants, fire alarms and fire extinguishers etc.) and it was also inspected monthly. There were at least 2 emergency exits connected to the outsides. Per employees' interview, employees were aware of the location of emergency exits and how to use the fire-fighting equipment. Factory management also represented that they would take corrective action as soon as possible. 4. It was noted that the factory failed to provide the special equipment operator certificate for 1 pressure vessel and the original document of safety management certification for 1 cargo lift in the factory for auditor's review, but they could provide the copy one for review. This violates Article 38 of Safety Monitoring Regulation of Special Equipment. Operator was not qualified per law requirement. Factory management stated that they would take improvements later.

1. 审核发现工厂未能向审核员提供工厂楼房的建筑工程竣工验收报告供查阅。该建筑竣工日期为2005年。根据《中华人民共和国建筑法》第61条。工厂解释工厂楼房是租赁的,房东没有提供原件。现场查看,楼房没有发现裂缝。工厂表示会尽快做出整改。2. 审核发现工厂未能向审核员提供工厂楼房的建筑工程竣工验收备案表的原件供查阅,但能提供复印件。该建筑竣工日期为2005年。根据《建设工程质量管理条例》第四十九条。工厂解释工厂楼房是租赁的,房东没有提供原件。现场查看,楼房没有发现裂缝。工厂表示会尽快做出整改。3. 工厂未能提供工厂楼房的消防验收合格证明的原件供查阅,但能提供复印件。根据《建设工程消防监督管理规定》第13条:根据《建设工程消防监督管理规定》第24条(节选)。工厂的厂房是租赁的,房东仅提供了复印件给工厂。租赁合同有提供查看。现场查看,工厂已经配备了足够有效的消防器材并且有每月定期检查,每层至少有2个紧急出口。员工访谈,员工也知悉工厂消防器材的使用以及紧急出口的位置。工厂表示会尽快做出整改。4. 审核发现工厂未能提供1台压力容器的压力容器操作证书和未能提供1台货梯的电梯安全管理人员证的原件供查阅,但能提供复印件。违反《特种设备安全监察条例》第38条。操作工人不具备资质。工厂反映会在今后改善。

7.13 - 1. It was noted that there was no warning sign was posted on 2 electricity switch boxes in the factory per factory tour. In accordance with Article 2-7 of Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008. It may have electric shock risk due to lack of warning sign on the electricity switch boxes and electricity boxes. Factory management represented that they would take corrective action as soon as possible. 2. It was noted that plastic frames were laid beside the 1 out of 10 electric switch boxes on the 4th floor in the workshop of production building. In accordance with Article 6.5 of the General Guide for Safety of Electric User (GB/T13869-2008) Factory management represented that they would take corrective action as soon as possible.

1. 审核员发现全厂有2个电开关盒没有张贴警示标识。根据《安全标志及使用导则(GB 2894-2008)》警示标志2-7 缺失警示标志不能有效提醒员工有触电的风险。工厂表示会尽快做出整改。2. 审核员发现生产楼4楼车间1/10个电开关盒下边堆放了塑料框等。根据《用电安全导则GB/T13869-2008》第6.5条 工厂表示会尽快做出整改。

7.23 - No transportation was provided to workers.
工厂未提供交通工具给工人。

Remarks from Auditee:

None

Performance Area 8 : No Child Labour	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The main auditee fully respects this principle because: The factory established its child labor forbidden policy. It was noted that the HR related officer had to check the ID and age during the hiring process. Through management interview, worker representative interview and employee interview, all knew the child labor forbidden policy and confirmed no child labor in the factory. The youngest employee noted during this audit was 19 years old. 被审核方完全尊重BSCI的本条原则, 原因是: 工厂建立了禁止童工政策。负责招聘的相关HR人员知道他们必须严格核实新员工的年龄。员工面谈, 员工代表面谈和管理层面谈都证实清楚的知晓禁止童工政策并且确定工厂没有童工。最小年龄为19岁。	
Remarks from Auditee: None	
Performance Area 9 : Special protection for young workers	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The main auditee fully respects this principle because: The factory had established related policies to ensure young workers' working time and not to contact with hazardous materials. Worker representative stated that the factory held training and meetings to take special care for young workers. No young worker was found in the factory. 被审核方完全尊重BSCI的本条原则, 原因是: 工厂建立了完整的未成年工保护政策, 包括工作时间和禁止未成年工接触有毒化学品等等。员工代表还表示, 会举行定期的会议, 来提醒特别关照未成年工。工厂没有未成年工。	
Remarks from Auditee: None	
Performance Area 10 : No Precarious Employment	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The main auditee fully respects this principle because: The factory had established clear recruit policies to respect local law requirements. Confirmed through employee and employee representative interview, they need to sign standard labor contracts with factory and they kept one labor contract. 被审核方完全尊重BSCI的本条原则, 原因是: 工厂建立了清楚地招聘程序来遵守当地的法规要求。通过员工和员工代表面谈, 确认所有员工进厂时必须签标准的劳动合同, 并且他们自己都留有一份合同。	
Remarks from Auditee: None	
Performance Area 11 : No Bonded Labour	
Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Based on site tour, document review and interview, the auditee didn't limit the employees' freedom including resignation or ask for leave from the factory. The inhumane or degrading treatment, corporal punishment, mental or physical coercion and/or verbal abuse never occurred. There was no prison labor or forced labor. No ID card or wage was withheld by factory. It was observed that workers were working without pressure. Disciplinary measures were all reasonable: Verbal warning, warning letter and termination. 被审核方完全尊重BSCI的本条原则, 原因是: 基于现场走访, 文件评估和访谈, 被审核方没有限制员工的自由, 包括离职或请假。工人从未受到不人道或有辱人格的待遇、体罚、精神或肉体胁迫和/或辱骂。工厂里没有监狱劳工或强迫劳动。工厂没有扣留工人的身份证和工资。员工在工厂里工作没有压力。处罚措施是合理的, 处罚措施包括: 口头警告, 警告信和解雇。	
Remarks from Auditee: None	

Performance Area 12 : Protection of the Environment

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: A

Deadline date:07/01/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially respected the requirement of this performance area. Per document review, management interview and employees' private interview, it was noted that the auditee continuously identified the significant impacts and environmental implications associated to its activity, and established the proper procedure to ensure integration of local environmental law into the business performance. However, based on satisfactory evidence, gaps were identified in implementation. (i.e. they could not provide the hazardous waste entrust disposal contract and relevant transfer manifest for review)

整体观察表明,受审核方部分满足这个PA的要求。通过文件查阅、管理层访谈和员工访谈,审核发现被审核方持续识别其商业活动的重大影响及对环境造成的后果,并且建立了合适程序来确保其商业模式中结合了当地环境法规。但是在实际执行中仍存在问题(例如:未能提供危废的转移联单供查阅)。

- 12.4 -** It was noted that the waste mineral oils (HW08) (waste engine oil, rags with oil) and waste organic solvent (HW12) etc. was disposed by Shenzhen City Shentou Environmental Protection Technology Co., Ltd. And the contractor had the valid contractor's hazardous waste operation license. However, the factory management was unable to provide the hazardous waste transfer manifest for review. This violated Article 6 of the Measures for Administration of Hazardous Waste Transfer Manifest Factory did not obtain the law required environmental documents before their operation. Factory management represented they would take action later.

审核员发现工厂提供了合同证明将废矿物油(HW08)(废机油、含油手套)和废有机溶剂(HW12)等交给深圳市深投环保科技有限公司处置,该处理商具有有效的危废经营许可证。但工厂不能提供这些危废的转移联单。根据《危险废物转移联单管理办法》第六条 工厂未有按照法律要求取得相关环保文件。工厂反映会采取行动改善。

Remarks from Auditee:

None

Performance Area 13 : Ethical Business Behaviour

Full Audit [Audit Id - 139717] Audit Date: 07/12/2018 PA Score: B

Deadline date:07/01/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partial respected the requirement of this performance area. Per factory tour, document review, management interview and employees' private interview, it was noted that the auditee has set up appropriate measures to ensure and demonstrate no corruption, extortion, embezzlement, bribery, falsified information or misrepresentation in the supply chain. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context and policies/procedures against any act of corruption and takes active measures to prevent and remediate them. However, based on satisfactory evidence, gaps were identified in implementation.

整体观察表明,受审核方部分满足这个PA的要求。通过文件查阅、管理层访谈和员工访谈,审核发现工厂建立了合适的管理措施来确保及明确在供应链中不能存在行贿索贿,挪用盗用公款,贪腐,提供虚假资料,虚报等行为。在管理制度中明确了在哪些方面可能存在贪腐,挪用公款或者贿赂等行为以及相应的预防管理措施。但是在实际执行中仍存在问题。

- 13.4 -** Per document review and management interview, it was noted that the facility didn't establish the policy or procedure for its collecting, using or otherwise processing personal information with reasonable care. Please refer to BSCI PA 13.4 Personal information protect was very important element to protect employees. The facility management represented that they protected employees' personal information in practice, but they didn't document the files.

经过文件查阅和管理层访谈,审核发现工厂没有建立关于个人隐私信息保密的政策或程序。请参看BSCI 13.4 个人隐私保护是保护员工的一种方式。工厂管理层表示在实际执行中是有对员工的隐私进行保护的,只是没有保存相关的文件。

Remarks from Auditee:

None

Summary

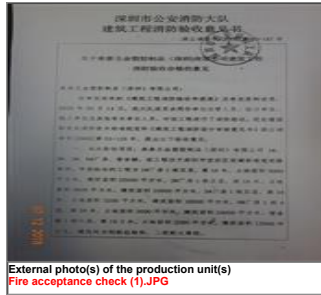


Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	07/12/2018	139717	C	A	A	A	A	D	A	A	A	A	A	A	B	C

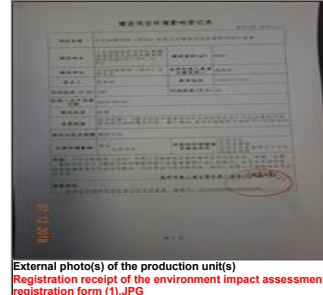
Producer Photos



External photo(s) of the production unit(s)
7.13 (1) no warning sign.JPG



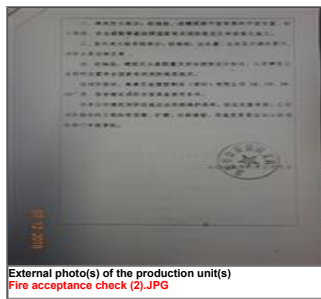
External photo(s) of the production unit(s)
Fire acceptance check (1).JPG



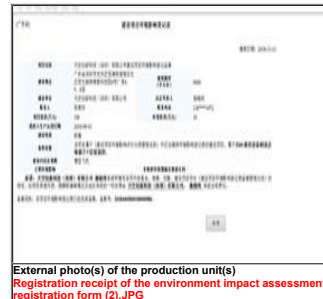
External photo(s) of the production unit(s)
Registration receipt of the environment impact assessment
registration form (1).JPG



External photo(s) of the production unit(s)
7.13 (2) plastic frames were laid beside electric switch
box.JPG



External photo(s) of the production unit(s)
Fire acceptance check (2).JPG



External photo(s) of the production unit(s)
Registration receipt of the environment impact assessment
registration form (2).JPG



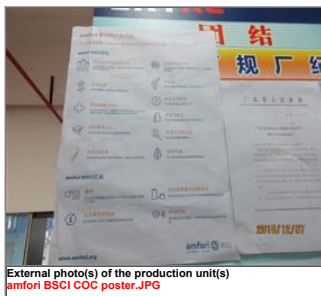
External photo(s) of the production unit(s)
7.6 no wearing rubber gloves.JPG



External photo(s) of the production unit(s)
fire alarm.JPG



External photo(s) of the production unit(s)
safety exit sign and emergency light.JPG



External photo(s) of the production unit(s)
amfori BSCI COC poster.JPG



External photo(s) of the production unit(s)
fire extinguishers.JPG



External photo(s) of the production unit(s)
SMT section.JPG



External photo(s) of the production unit(s)
assembling workshop.JPG



External photo(s) of the production unit(s)
fire hydrant testing.JPG



External photo(s) of the production unit(s)
Social insurance receipt in November 2108.JPG



External photo(s) of the production unit(s)
Building Re-name.JPG



External photo(s) of the production unit(s)
fire hydrant.JPG



External photo(s) of the production unit(s)
spot welding.JPG



External photo(s) of the production unit(s)
chemical storage area.JPG



External photo(s) of the production unit(s)
first aid kit.JPG



External photo(s) of the production unit(s)
structural license.JPG



External photo(s) of the production unit(s)
CNC section.JPG



External photo(s) of the production unit(s)
inserting section.JPG



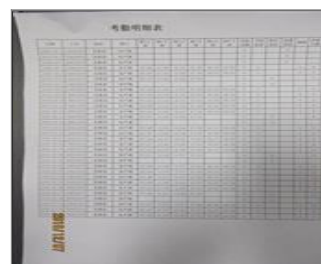
External photo(s) of the production unit(s)
suggestion box.JPG



External photo(s) of the production unit(s)
drinking water supply.JPG



External photo(s) of the production unit(s)
lease contract (1).JPG



External photo(s) of the production unit(s)
time record sample.JPG

