
Auditee :	Shanghai KuKa Special Cable Co., Ltd.
Audit Date From :	15/05/2020
Audit Date To :	15/05/2020
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company :	TUEV Rheinland
Auditor's Name(s) :	Sibyl Zhu(Lead)
Auditing Branch (if applicable) :	TUV Rheinland China



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	<ul style="list-style-type: none"> Minimum 7 Performance Areas rated A No Performance Areas rated C, D or E These are three examples: A B B B A A A A A A A B 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.
B Good	<ul style="list-style-type: none"> Maximum 3 Performance Areas rated C No Performance Areas rated D or E These are three examples: 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.
C Acceptable	<ul style="list-style-type: none"> Maximum 2 Performance Areas rated D No Performance Areas rated E These are three examples: A A A A A A A A C C C C A A A A A B B B C C C D 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.
D Insufficient	<ul style="list-style-type: none"> Maximum 6 Performance Areas rated E These are three examples: A A A A A A A A A A D D D A A A B B B C C C D D D E D D D D D D D E E E E E E	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
E Unacceptable	<ul style="list-style-type: none"> Minimum 7 Performance Areas rated E These are three examples: 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	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
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 :	Shanghai KuKa Special Cable Co., Ltd.		
DBID number :	400338		
Audit ID :	180631		
Address :	No.5878,Nanjin Road, Jinshan District, Shanghai		
Province :	Shanghai Shi	Country :	China
Management Representative :	Kunbing Wang		
Contact person:	Huihui Cai	Sector :	Non-Food
Industry Type :	Mechanical and electrical engineering	Product group :	Electrical supplies
Product Type :	Electrical wire		

Audit Details



Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural <input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced <input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No	
Audit extent (if applicable) :	none	
Audit interferences or contingencies (if applicable) :	none	
Overall rating :	C	
Need of follow-up :	Yes	If YES, by : 15/05/2021

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

Executive summary of audit report
<p>The factory was located at No.5878, Nanjin Road, Jinshan District, Shanghai 上海市金山区亭林镇南金公路5878号.</p> <p>The factory used two 1-storey buildings for warehouse and workshop and one flat building as warehouse. The area was about 1700m2. No canteen or dormitory was provided. The area was rented from the landlord. There were several buildings in the same boundary and most of them were broken only one 1-storey building was used by the landlord as warehouse and one 1-storey building was rented to one hardware factory. The auditee had no business relationship with the other factories in the same boundary. Based on worker interview, they never worked in other these factories. The business license and lease contract was provided for review.</p> <p>The product was Electrical wire. The main production processes were: wire bunching, braiding, cabling, sheathing, inspection and package. No obvious peak season was in the factory.</p> <p>There were total 19 employees in the factory. No labor agent was used, no contractor license/permit, government waiver or collective bargaining agreement was needed for the factory. No subcontractor was used.</p> <p>No need for the factory to obtain the environment permit according to local requirement. There was no security guard in the factory since the landlord was in charge of the safety of the area.</p> <p>The management agreed with all findings in the audit and allowed auditors to conduct onsite observation, document review, worker interview, etc.</p> <p>Remark:</p> <ol style="list-style-type: none"> Auditor's APSCA NO. was 21701957(Sibyl Zhu) . The address on the amfori BSCI platform was "No.5878,Nanting Road,Jinshan District, Shanghai" which was wrong spell of "Nanting". It should be "Nanjin". The factory used the BLDG 13 and BLDG 14 but the registered address was only BLDG 13. The factory didn't want to show the detail building number in the address and decide to use "No.5878, Nanjin Road, Jinshan District, Shanghai 上海市金山区亭林镇南金公路5878号" in the amfori BSCI platform. The former registered address was "No.4103, BLDG 2, No.383, East Huancheng Road, Fengxian, Shanghai (上海市奉贤区环城东路383号2幢4103室)" which was 25km away. The factory explained that the former address was only the registered address and the factory never produced there. The factory updated the business license on 13 June 2019. The former name was "Shanghai Huihong Electrical Wire and Cable Co., Ltd (上海徽泓电线电缆有限公司)" which was changed in 2016. No amfori BSCI audit was conducted with this name.

Ratings Summary



Auditee's background information			
Auditee's name :	Shanghai KuKa Special Cable Co., Ltd.	Legal status :	limited company
Local Name :	上海库味特种电缆有限公司 (91310120052956573W)	Year in which the auditee was founded :	2012
Address :	No.5878,Nanjin Road, Jinshan District,	Contact person (please select) :	Huihui Cai
Province :	Shanghai Shi	Contact's Email :	bill@kukacable.com
City :	Shanghai	Auditee's official language(s) for written communications :	Chinese
Region :	North East Asia	Other relevant languages for the auditee :	none
Country :	China	Website of auditee (if applicable) :	none
GPS coordinates :	E121°20'19.57" N30°53'27.02"	Total turnover (in Euros) :	5000000.00
Sector :	Non-Food	Of which exports % :	85.00
Industry :	Mechanical and electrical engineering	Of which domestic market % :	15.00
If other, please specify :		Production volume :	80000 km/year
Product Group :	Electrical supplies	Production cost calculation :	Yes
If other, please specify :		Lost time injury calculation cost :	Yes
Product Type :	Electrical wire		

Auditee's employment structure at the time of the audit			
Total number of workers :	19	Total number of workers in the production unit to be monitored (if applicable) :	0
		MALE WORKERS	FEMALE WORKERS
Permanent workers		13	6
Temporary workers		0	0
In management positions		1	0
Apprentices		0	0
On probation		0	0
With disabilities		0	0
Migrants (national citizens)		12	6
Migrants (foreign citizens)		0	0
Workers on the permanent payroll		13	6
Production based workers		0	0
With shifts at night		0	0
Unionised		0	0
Pregnant		-	0
On maternity leave		-	0

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: D

Deadline date:31/12/2020

GOOD PRACTICES:

not observed

AREAS OF IMPROVEMENT:

The factory had set up a management system to implement amfori BSCI requirement such as making the policies and procedures based on amfori BSCI requirement, appointing the designated personnel to in charge of the system and training the workers on the policies and procedures. The management representative had a good understanding on the amfori BSCI requirements such as freedom of association, no discrimination, decent working time, wages and benefits, no child labor, no forced labor and so on. The factory established the business partners' selection procedure to select current and future significant business partners. However, the gaps were been identified in implementation.

工厂建立了一个管理体系去执行amfori BSCI的要求, 包括根据amfori BSCI的要求去制定相关的政策和程序、委派专人负责体系的执行和培训员工相关的方针政策。管理者代表对amfori BSCI的要求有比较好的了解, 如结社自由、不歧视、体面的工作时间、工资和福利、禁止童工、不强迫劳工等等。工厂建立了商业合作伙伴选择程序去选择当前的和未来的主要合作伙伴。然而, 在实施过程中仍有差距。

1.1 - It was noted that the factory had established the documented CSR system, but they didn't have the practice to ensure the internal procedures to integrate the amfori BSCI Code into daily business practices. For example, the monthly overtime exceeded 36 hours, not providing social insurance to part of workers, occupational health and environment protection etc. The factory management stated that they know the local law requirement clearly and has conducted internal audit, but some findings can not be solved in a short time due to the high cost of manpower and rush order. The interviewed workers stated that they did not know overtime control mechanism and social insurance participation plan, etc.

评估中发现工厂已经建立了社会责任体系, 但未能采取切实可行的措施确保amfori BSCI行为守则的要求落实到公司的日常运作。比如员工月加班超过36小时、社会保险参保不足、职业健康和环境保护等。管理人员表示他们清楚法规要求也进行了内部审核, 但由于人力成本高昂和繁忙的订单, 有些问题很难在短时间内解决。被访谈的员工表示他们不知道工厂的加班管控机制和社会保险参保计划等。

1.4 - It was noted that although the factory had assessed the workforce capacity, but the factory should arrange workers overtime working if production needed to meet the expectations of the delivery order and/or contracts. So the monthly overtime working hours exceeded legal requirement. Details refer to 6.2.

评估中发现工厂尽管工厂已对劳动力资源及产能进行了规划, 但是还需要在必要时安排员工加班以满足订单出货需求。因此加班时间超过法律法规要求。详细参照6.2。

Remarks from Auditee:

none

Performance Area 2 : Workers Involvement and Protection

Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: B

Deadline date:31/10/2020

GOOD PRACTICES:

not observed

AREAS OF IMPROVEMENT:

The factory had established document procedure that involved workers and their representatives in sound information exchange on workplace issue. The factory made management and workers to be aware of their rights and responsibilities and have sufficient competence by training and communication. Workers elected 1 workers representative in 2019. The factory published the amfori BSCI Code of Conduct and poster at the workplace and workers could access to read it freely. However, the gaps were been identified in implementation.

工厂有建立文件化的程序以便于参与工人及其代表交流工厂场所的有关信息。工厂通过培训, 沟通等方式使管理人员及工人了解其权利和责任, 并具备相应能力。员工在2019年选举出1名员工代表。工厂将amfori BSCI行为准则和海报公示在工作场所且员工能够自由地进行阅读。然而, 在实施过程中仍有差距。

2.2 - It was noted that the factory defined the goals to protect employees according to amfori BSCI Code of Conduct, such as reduce OT hours, no work injury, etc, but did not periodically review the implementation status.

工厂根据amfori BSCI行为守则定义了保护员工的目标, 比如减少加班时间、没有工伤等, 但是未定期回顾目标执行情况。

2.4 - According to the training record, the factory has provided amfori BSCI training to employees. But the factory did not evaluate the training effectiveness, 50% interviewed employees did not clearly know amfori BSCI requirements, such as definition of child labor.

培训记录显示企业给员工提供了amfori BSCI培训, 但是企业没有评估培训的效果, 50%被访谈的员工不是很清楚amfori BSCI的要求, 例如童工的定义。

Remarks from Auditee:

none

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: No labor union was established in the factory, as a parallel way, democratically elected worker representatives were available. Workers representatives were allowed to carry out their duties within working hours without losing pay or other negative repercussions. No retaliation for participating in election processes of workers representatives observed as per workers interview. 工厂没有建立工会，作为同样的方式，有民主选举的员工代表。员工代表可以在工作时间内行使其职责而不会被克扣工资或者受到任何负面影响。根据员工访谈，参加员工代表选举过程的员工未受到打击报复。	
Remarks from Auditee: none	
Performance Area 4 : No Discrimination	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: The factory had conducted internal assessment on the most risky activates in which discrimination may occur and established documented policy and procedures to avoid occurrence of discrimination. Workers had trained how to use the grievance mechanism without fear of reprisal. Records of training had been retained. No discrimination case reported or identified in the past year. 工厂已经对可能出现歧视的最常见活动做出内部评估，并制定了书面政策和程序以禁止出现歧视行为。员工已经培训如何在不用担心报复的情况下使用申诉机制。培训记录进行了保留。在过去的一年里未发生过歧视案例的报告。	
Remarks from Auditee: none	
Performance Area 5 : Fair Remuneration	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:31/12/2020
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: Legal minimum wage was RMB2480/month (RMB14.25/hour). Payrolls from April 2019 to March 2020 were reviewed randomly. Overtime work was compensated legally. As shown in the payroll, paid annual leave and paid holidays were provided. Pay slip was issued to workers. In Employee Handbook, paid annual leave, statutory holiday, sick leave, marriage leave, maternity leave and funeral leave were defined. Wage was paid on 30th of each month. Workers' wages were paid at hourly rate (at least RMB17.9/hour) and by cash. No any deduction from wages was found in the factory. However, the gaps were identified in implementation. 法定最低工资为人民币2480元每月（14.25元每小时）。工厂提供了2019年4月至2020年3月的工资记录供审核。加班按照国家法律规定支付工资。工资表上显示，年休假工资和法定假日工资已支付。工资条会提供给员工。员工手册中，年休假，法定假，病假，婚假，生育假和丧假被清楚的写明。每月30号发工资，员工工资按时薪制现金发放，最低为人民币17.9元每小时。没有任何扣款被发现。然而，发现在实施中仍存在差距。 5.5 - The factory has total 19 employees. No retired employee and one new employee. 18 employees were applicable for social insurance, but 12 employees had not participated in social insurance including retirement insurance, basic medical insurance, unemployment insurance, maternity insurance and work-related injury insurance. The factory management stated that employees have participated in new-pattern rural social old-age insurance. Some interviewed workers stated that they have participated in new-pattern rural social old-age insurance, so did not want to participate in social insurance. Reference law: Social Insurance Law of the People's Republic of China, Article 10, 23, 33, 44 , 53 Remark: The factory had provided commercial accident insurance to workers who did not participate in social insurance, valid period from 14 May 2020 to 13 May 2021. 工厂总计有19名员工。没有退休员工，1名新员工。18名员工应该参加社会保险，但是12员工没有参加养老保险，医疗保险，失业保险，生育保险和工伤保险。工厂管理人员表示没有参加医疗保险的员工参加了新农保。一些被访谈的员工表示他们已经参加了新农保，所以不想参加社会保险。参考法律法规：《中华人民共和国社会保险法》第10，23，33，44，53条 备注：工厂为没有参加社会保险的员工提供了意外伤害保险，有效期为2020年5月14日至2020年5月13日。	
Remarks from Auditee: none	

Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: D

Deadline date:31/12/2020

GOOD PRACTICES:

not observed

AREAS OF IMPROVEMENT:

Workers working hours management procedure had established by the factory. Based on the working hours management procedure review, the procedure defined workers regular working hours was 8 hours a day and 40 hours a week. The overtime-working hours standard required the workers daily overtime-working hours were less than 3 hours and monthly overtime-working hours were less than 36 hours. Workers working hours recorded by fingerprint scan machine. 1 shifts for all employees: 8:00-12:00; 13:00-17:00. 6 sampled workers' working hours from April 2019 to audit date had reviewed during the audit. The sampled working hours records indicated that workers' maximum daily OT hours were 2 hours, maximum weekly OT were 16 hours and maximum monthly OT hours were 72 hours. One day off in every seven days guaranteed. From 1 May 2020 to the audit day, maximum daily OT were 2 hours, maximum weekly OT were 10 hours and maximum monthly OT hours were 14 hours. One day off in every seven days guaranteed. However, the gaps were identified in implementation.

工厂建立了员工工作时间的管理程序。根据对员工工作时间管理程序的审阅，该程序已经定义员工的正常工作时间为每日8小时每周40小时。加班工作时间标准要求员工的日加班少于3小时且月加班少于36小时。员工工作时间由指纹扫描机进行记录。所有员工1班：8:00-12:00；13:00-17:00。6名抽样员工2019年4月至审核当日的考勤进行了查阅，抽样员工的工作时间记录显示员工的最大日加班为2小时，最大周加班16小时，最大月加班为72小时。每七天休息一天有保证。从2020年5月1日到审核当天，最大日加班为2小时，最大周加班10小时，最大月加班为14小时。每七天休息一天有保证。然而，在实施过程中仍有差距。

6.2 - The factory did not establish overtime control mechanism. The working hours recording system didn't have capacity to control excessive working hours. The factory Office Director stated that the factory has working hour policy, but no overtime control mechanism was established, workers want to work some overtime to earn more money. Interviewed worker did not know overtime control mechanism. The monthly overtime hours exceeded 36 hours in most months. For example: the highest monthly overtime hours of 6 sampled workers in August 2019 were 62 hours; in November 2019 were 72 hours; in March 2020 were 46 hours. Reference law: PRC Labour Law article 41.

工厂没有建立加班时间管控机制。工厂的工时记录系统不具备控制额外的加班的功能。工厂的办公室主任表示企业有工作时间政策，但是没有建立加班时间管控机制，员工想要加班来赚取更多的钱。被访谈的员工不知道加班时间管控机制。审核发现企业在过去大多数月中月加班超过36小时。例如，抽取的8名样本员工的最高加班时间为：在2019年8月加班时间达到62小时；在2019年11月加班时间达到72小时；在2020年3月加班时间达到46小时。参考法律法规：《中华人民共和国劳动法》第41条

Remarks from Auditee:

none

Performance Area 7 : Occupational Health and Safety	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:31/12/2020
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: <p>The factory had made its own health and safety procedure based on the legal requirements and amfori BSCI Code of Conduct. The factory organized the OHS committee and carried out the periodical OHS meeting. The latest one conducted on 8 May 2020. The OHS risk assessment record and implementation plan were provided. The fire drill was conducted twice which covered workshops and the latest one conducted on 10 April 2020. Based on site observation, it was noted that workers were wearing earplugs. Warning signs were posted on the electrical control panels reminding the workers of potential electrical hazards. Sufficient fire extinguishers, fire hydrants, fire early warning system were installed and inspected monthly. Evacuation routes were not blocked and evacuation plans posted at each workplace. An agreement was signed with a local hospital to ensure quick remediation. Remark: The factory didn't provide the canteen, dormitory and transportation for workers. However, the gaps were been identified in implementation.</p> <p>工厂按照法规要求和amfori BSCI行为准则建立了健康安全程序。工厂组织建立了健康安全委员会并且定期进行健康安全的会议。最近一次安全会议在2020年5月8日进行。职业健康安全风险评估记录及控制计划有提供。消防演习每年2次，覆盖了所有车间，最近一次是在2020年4月10日。现场巡厂发现，车间的员工在工作时佩戴了耳塞。配电箱有张贴警示提醒员工潜在的电击风险。足够的灭火器、消防栓、消防报警系统正确地安装同时进行每月检查。车间逃生路线不受堵，逃生计划图在每楼层张贴。工厂与附近的医院签署急救协议。备注：工厂没有给员工提供食堂、宿舍和交通运输。然而，在实施过程中仍有差距。</p> <p>7.1 - 1.Factory didn't provide pre-service, on-service and post-service occupational health exam for braiding, cabling workers, etc who worked with noise. Reference Law: Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35 2. The factory didn't conduct noise test in braiding workshop and cabling workshop, etc. Reference Law: Provisions on the Supervision and Administration of Workplace Occupational Health Article 20 1.工厂未给接触噪音的编织工人、成缆工人等，提供岗前、岗中和离岗职业健康体检。参考法规：中华人民共和国职业病防治法，第三十五条 2.工厂未在编织车间，成缆车间等进行噪音测试。参考法规：《工作场所职业卫生监督管理规定》第二十条</p> <p>7.3 - The factory conducted the position risk assessment, but didn't distinguish occupational hazards, such as noise in the braiding process. 工厂管理层进行了岗位风险评估，但未识别出职业风险，如编织工序的噪音。</p> <p>7.9 - Based on the onsite observation, the factory didn't post occupational hazard notification card in braiding workshop where contained noise. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24 经现场观察，工厂没有在存在噪音的编织车间张贴职业危害告知卡。参考法律法规：中华人民共和国职业病防治法 第二十四条</p> <p>7.11 - Based on onsite observation, the building was maintained well. Based on management interview, the factory did not obtain the fire safety approval or record for the two 1-storey buildings (as claimed by factory management that it was about 864m² respectively and were completed in 2005). Reference law: Fire Prevention Law of the People's Republic of China, Article 13 经现场观察，厂房维护得良好。经管理层访谈，工厂未取得2栋1层建筑的消防安全的证明或者报告（管理层表示这2栋1层大约分别864平米，建成于2005年）。参考法律法规：中华人民共和国消防法 第13条</p> <p>7.17 - There was no handrail for about 3 ladders which were about 1m-1.2m high in sheathing workshop. reference law: Safety of Machinery-Permanent Means of Access to Machinery-Part 3: Stairs, stepladders and guard-rails (GB17888.3-2008) 7.1.2 护套车间约3台1米-1.2米高的梯子缺失扶手。参考法规：机械安全 进入机械的固定设施 第3部分：楼梯、阶梯和护栏（GB17888.3-2008）7.1.2</p> <p>7.22 - Based on onsite observation and worker interview, no soap was provided in the basin. 根据现场观察和员工访谈，工厂洗手池没有配置肥皂。</p>	
Remarks from Auditee: none	
Performance Area 8 : No Child Labour	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: <p>The factory established written policy and procedure to prohibit the use of child labor. Child labor remedial procedure was also documented. The HR department was appointed to hire the new employees and the staff knew the policies and the laws related to child labour, the HR staff had technical ability to verify the employee's true identity. The management claimed that the factory never hired child labor before. There was no child labor defected in the factory during the audit.</p> <p>工厂建立了书面的政策和程序禁止使用童工，童工拯救程序也已文件化。HR部门负责新员工的招聘，经过访谈得知负责招聘的人员了解相关的要求并且有能力发现并核实员工的真实身份。管理层声称工厂从来没有雇佣过童工，审核中工厂内也没有发现童工。</p>	
Remarks from Auditee: none	

Performance Area 9 : Special protection for young workers	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: The factory established the procedure for protecting young worker and conducted risk assessment to prevent, identify and mitigate harm to young workers. If recruited any young worker, they would not be arranged the position with hazard exposure, and health check as per the legal requirements would be conducted. Through roster review and workers & management interview, there was no young worker used in the factory. 工厂建立了未成年工保护程序。对未成年工所处的风险进行了评估，以预防、识别并减缓未成年工所受到的伤害。如果招聘到未成年工，他们将不会安排在有毒有害岗位，并且将按照法规要求接受健康体检。通过核对花名册，以及通过员工和管理层访谈，没有发现企业使用未成年工。	
Remarks from Auditee: none	
Performance Area 10 : No Precarious Employment	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:31/10/2020
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: The factory established program files of No Precarious Employment. The factory signed labor contracts with all workers who had been working in the factory more than 1 month. All workers have one copy of labor contract and know the terms of labor contract. The factory had established recruitment procedure, employee manual and work rules which were based on amfori BSCI Code of Conduct and local laws. Based on interview statement of workers, workers understood well of the content of labor contract and no illegal employment was identified during the audit. 工厂制定了无缺乏保障就业的程序文件，工厂和所有工作超过一个月的员工签订了劳动合同。所有工人均有合同副本并理解合同条款内容。工厂基于amfori BSCI行为守则和当地的法律法规建立了招聘程序、员工手册和厂纪厂规。通过员工访谈，员工均了解劳动合同内容，审核过程中，工厂无不合法规的用工形式存在。 10.2 - Based on workers' labor contract review, it was noted that no occupational hazards notification for relevant operators was in place, such as braiding workers workers. Reference Law: Article 33 of Law of the People's Republic of China on Prevention and Control of Occupational Diseases 工人劳动合同审核发现，工厂没有对有害岗位进行职业危害告知，如编织员工，参考法律法规：中华人民共和国职业病防治法 第33条	
Remarks from Auditee: none	
Performance Area 11 : No Bonded Labour	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: Factory did not keep any original documents from the workers or collect any deposit upon hiring. The factory established the policy on anti-forced labor. The management understood well the scope of forced labor. Workers could freely terminate the employment contracts upon 30 days' advance notice in written form after probation period or 3 days' advance notice in written form during probation period. The factory did not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labor. 工厂在招工时未收取任何形式的押金，也没有扣押员工证件。工厂制定了反强迫劳动的政策，工厂负责人理解哪些方式是属于强迫劳动的范畴。员工可以自由选择终止劳动关系在30天的通知期和试用期员工3天的通知期。工厂未雇佣任何形式的劳役，强迫，抵债，非自愿工人。	
Remarks from Auditee: none	

Performance Area 12 : Protection of the Environment	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:31/12/2020
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: <p>The factory had established environmental protection management procedure. Monitoring was conducted on waste air, boundary noise and living waste water on annual basis with the latest in 30 May 2019 and the result met requirement. The supplier management policy had defined the environment protection requirement and required the suppliers followed with the policy. The government had not required the factory to apply for the pollution discharge permit. However, the gaps were been identified in implementation.</p> <p>工厂建立了环境保护相关管理程序。进行了环境因素的年度监测，包括废气、厂界噪音和生活废水，最近一次是在2019年5月30日，结果符合要求。供应商管理政策中对于环保要求进行了定义并要求执行。政府尚未要求工厂去申请排污许可证。然而，在实施过程中仍有差距。</p> <p>12.1 - It was noted that the factory did not provide the Environmental Protection Acceptance Check Report for their completed construction project for review which was required in EIA Approval. Reference law: Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project, Article 7 评估中发现工厂没有提供环评批复里要求的建设项目竣工环境保护验收报告供审核。参考法律法规：建设项目竣工环境保护验收暂行办法，第七条</p>	
Remarks from Auditee: none	
Performance Area 13 : Ethical Business Behaviour	
Full Audit [Audit Id - 180631] Audit Date: 15/05/2020 PA Score: A	Deadline date:31/12/2020
GOOD PRACTICES: not observed	
AREAS OF IMPROVEMENT: <p>The factory had established anti-bribery and anti-corruption procedure, and they had given training to employees for this issue and all employees had signed statement of complying with this policy. The factory established the detailed procedure to ensure transparency to all aspects of it's operation. Furthermore, inconsistencies are not noted by cross checking the production records with time records. However, the gaps were been identified in implementation.</p> <p>工厂已建立反贿赂、反腐败程序，并且已向员工提供了相关培训。全部员工已签署廉政声明。工厂制定了详细的程序来确保其在运作的各个环节保持公开透明。此外，通过反复核对生产记录和工时记录，没有不一致。然而，在实施过程中仍有差距。</p> <p>13.2 - The address on the business license didn't cover all area. The address on the business license was BLDG 13, No.5878,Nanjing Road, Jinshan District, Shanghai but both BLDG 13 and BLDG 14 were used. Reference law: Regulations of PRC for controlling the registration of enterprises as legal persons Article 17 工厂营业执照地址未包含所有使用范围。工厂营业执照地址为上海市金山区亭林镇南金公路5878号13幢，而实际使用的是13幢和14幢。法律法规：中华人民共和国企业法人登记管理条例 第十七条</p>	
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	15/05/2020	180631	D	B	A	A	A	D	A	A	A	A	A	A	A	C

Producer Photos



External photo(s) of the production unit(s)
factory address.JPG



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



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



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



Photo first aid facilities
first aid kit.JPG



Photo of fire safety equipment
check the fire hydrant.JPG



Photo of fire safety equipment
emergency light exit sign fire alarm.JPG



Photo of fire safety equipment
evacuation map.JPG



Photo of fire safety equipment
fire extinguisher.JPG



Photo of fire safety equipment
fire hydrant.JPG

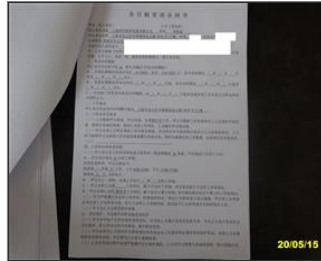


Photo of non-conformity
10.2 no occupational hazards notification.JPG



Photo of non-conformity
13.2 business license not cover all area.JPG

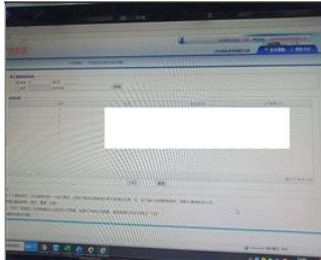


Photo of non-conformity
6.6 social insurance for part workers.jpg



Photo of non-conformity
6.2 monthly OT exceeded 36 hours.JPG



Photo of non-conformity
7.17 no no handrail for ladder.JPG



Photo of non-conformity
7.22 no soap in the basin.JPG



Photo of the code of conduct on display
posted amfori BSCI code and poster.JPG



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



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



Photo of the inside of the main production hall
finished product warehouse.JPG



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



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



Photo of the inside of the main production hall
suggestion box.JPG



Photo of the inside of the main production hall
time machine.JPG



Photo of the inside of the main production hall
wire bunching.JPG



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



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



Photo of the sanitary facilities
potable water.JPG



Photo of the sanitary facilities
toilet.JPG