

---

Auditee :	<b>Zhongshan Claler Garments Co., Ltd</b>
Audit Date From :	<b>16/10/2018</b>
Audit Date To :	<b>17/10/2018</b>
Expiry Date of the Audit :	<b>Please refer to the producer profile in the amfori BSCI platform</b>
Auditing Company :	<b>TUEV Rheinland</b>
Auditor's Name(s) :	<b>Jason Deng(Lead)</b>
Auditing Branch (if applicable) :	<b>TUV Rheinland China</b>

---



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

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

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

Rating Definitions



Rating	A combination of ratings per Performance Area where:	Consequence
<b>A</b> <b>Very Good</b>	<ul style="list-style-type: none"> <li>Minimum 7 Performance Areas rated A</li> <li>No Performance Areas rated C, D or E</li> </ul> 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>B</b> <b>Good</b>	<ul style="list-style-type: none"> <li>Maximum 3 Performance Areas rated C</li> <li>No Performance Areas rated D or E</li> </ul> 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.
<b>C</b> <b>Acceptable</b>	<ul style="list-style-type: none"> <li>Maximum 2 Performance Areas rated D</li> <li>No Performance Areas rated E</li> </ul> These are three examples: 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 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.
<b>D</b> <b>Insufficient</b>	<ul style="list-style-type: none"> <li>Maximum 6 Performance Areas rated E</li> </ul> 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.
<b>E</b> <b>Unacceptable</b>	<ul style="list-style-type: none"> <li>Minimum 7 Performance Areas rated E</li> </ul> These are three examples: A A A A A A E E E E E E E A A B B C D E	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
<b>Zero Tolerance</b>	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 :	<b>Zhongshan Claler Garments Co., Ltd</b>		
DBID number :	<b>384354</b>		
Audit ID :	<b>135664</b>		
Address :	<b>No. 72, Dongsheng West Road, Xiaolan Town, Zhongshan</b>		
Province :	<b>Guangdong</b>	Country :	<b>China</b>
Management Representative :	<b>Mr. Jianxing Chen</b>		
Contact person:	<b>Joe Zhang</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Textiles, clothing, leather</b>	Product group :	<b>Apparel</b>
Product Type :	<b>Men's boxers, men's briefs, men's t-shirt</b>		

**Audit Details**



Audit Range :	<input checked="" type="checkbox"/> Full Audit	<input type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	Limited scope (one production unit)		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 17/10/2019	

**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
D	B	A	A	B	D	A	A	A	A	A	A	A

**Executive summary of audit report**

The auditee was including two sites: site 1-The 1F,3F, 4F, No.21, Ronghua South Road, Shakou, Xiaolan Town, Zhongshan (中山市小榄镇沙口荣华南路21号首层之二、之三、之四及三楼、四楼); site 2- No. 72, Dongsheng West Road, Xiaolan Town, Zhongshan(中山市小榄镇东生西路72号). There were same products in two sites. For site 1, there were about 200 workers and all products were for the domestic market; for site 2, there were 80 workers and all products were for export market. It was about 3 km far away from two sites. Site 2 was registered as Zhongshan Claler Garments Co., Ltd by First Branch (中山市喜来乐服饰有限公司第一分公司) before July 2017, but the business license was cancelled in July 2017, after then site 2 was included under Zhongshan Claler Garments Co., Ltd. Through worker and management interview, it was noted that no any shared workers and all management were independent for two sites. Following RSP approval, only site 2 was applied for this audit and this audit type was required as limited scope. The auditee was established in year 2009. There was one 5-storey buildings and this buildings was owned by Mr. Jiangming Cai. The auditee rented whole building and total area was 2250 sq. meters. No canteen and dormitory were provided for workers. No any other factory was inside of the factory boundary. The auditee specialized in manufacturing Men's boxers, men's briefs, men's t-shirt and its main production processes were cutting, sewing, inspection, packing. No obvious high and low season was in this factory. One entrance guard was directly employed by the auditee and the auditee would close factory door when shift over or holiday. About the washing label process, it was subcontracted to other company. During audit, management were very friendly. Opening and closed meeting were held successfully. No any interfere happened during worker interview. Management also allowed auditor to take some photos onsite.

**Remark:**

- 1). Chinese name of this factory was 中山市喜来乐服饰有限公司 and its English name should be "Zhongshan Xilaile Garments Co., Ltd" if literal translation. However, through reviewing purchase order, the auditee used the English name as "Zhongshan Claler Garments Co., Ltd". Management said they used "Zhongshan Claler Garments Co., Ltd" as their English name and customer also approved.
- 2). some documents were not applied for the auditee such as contractor license, agency labor contract, government waivers for social insurance, collective bargaining agreements; and the auditee did not provide EIA records. So these documents could not be uploaded to platform.
- 3). products of site 2 were 100% for export market, and the products of site 2 accounted for 25% of the total sales volume of the company.

**Ratings Summary**



Auditee's background information			
Auditee's name :	<b>Zhongshan Claler Garments Co., Ltd</b>	Legal status :	<b>Ltd company</b>
Local Name :	<b>中山市喜来乐服饰有限公司(统一社会信用代码:914420006863729405)</b>	Year in which the auditee was founded :	<b>2009</b>
Address :	<b>No. 72, Dongsheng West Road, Xiaolan Town,</b>	Contact person (please select) :	<b>Joe Zhang</b>
Province :	<b>Guangdong</b>	Contact's Email :	<b>Joe@claler.com</b>
City :	<b>Zhongshan</b>	Auditee's official language(s) for written communications :	<b>Chinese</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>None</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>www.claler.com</b>
GPS coordinates :	<b>N22°39'25.85?, E113°14'31.60?</b>	Total turnover (in Euros) :	<b>6230000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>100.00</b>
Industry :	<b>Textiles, clothing, leather</b>	Of which domestic market % :	<b>0.00</b>
If other, please specify :		Production volume :	<b>3000000 pcs per year</b>
Product Group :	<b>Apparel</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :		Lost time injury calculation cost :	<b>Yes</b>
Product Type :	<b>Men's boxers, men's briefs, men's t-shirt</b>		

Auditee's employment structure at the time of the audit			
Total number of workers :	<b>80</b>	Total number of workers in the production unit to be monitored (if applicable) :	<b>0</b>
	<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>	
Permanent workers	<b>0</b>	<b>0</b>	
Temporary workers	<b>22</b>	<b>58</b>	
In management positions	<b>4</b>	<b>2</b>	
Apprentices	<b>0</b>	<b>0</b>	
On probation	<b>0</b>	<b>0</b>	
With disabilities	<b>0</b>	<b>0</b>	
Migrants (national citizens)	<b>22</b>	<b>52</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>22</b>	<b>58</b>	
Production based workers	<b>0</b>	<b>0</b>	
With shifts at night	<b>0</b>	<b>0</b>	
Unionised	<b>0</b>	<b>0</b>	
Pregnant	<b>-</b>	<b>0</b>	
On maternity leave	<b>-</b>	<b>0</b>	

**Finding Report**



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

Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: D

Deadline date:15/10/2019

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

Management procedures basing on legal requirement and amfori BSCI CoC were established, and management would review them annually or if any update. The auditee appointed Mr. Jianxing Chen/ Commissioner as management representative to implement amfori BSCI running including daily operation and monitoring and he was aware of the basic amfori BSCI requirement. The auditee conducted internal audit and management review on CSR performance annually. The CSR performance of important business partners such as cloth material suppliers, packing material supplier, washing label subcontractor were regularly supervised (including to sign social accountability commitment, to assess social performance of suppliers, to pass amfori BSCI CoC and amfori BSCI Tol for them). The auditee respected workers basic right, such as no discrimination, no child labor, no bonded labor, etc. However, gaps have been identified in implementation during this audit:

依据amfori BSCI行为守则和法规的要求建立了管理程序, 管理层每年或者当有更新的时候会评审这些管理程序。被审核方已任命陈建星/总监作为管理者代表以保证amfori BSCI体系的运行, 包括日常运行以及监管; 他了解amfori BSCI的基本要求。被审核方每年进行社会责任方面的内审和管理评审。重要商业合作伙伴如布料供应商、包材供应商、水洗唛分包商等的社会绩效被定期监管, 其中包含签订社会责任承诺书, 评估了他们的社会责任表现, 传达amfori BSCI行为守则和amfori BSCI商业伙伴专用实施条款给供应商; 被审核方基本尊重工人的基本权利, 如没有歧视、童工、强迫劳动等方面的要求。尽管如此, 在实践中仍然存在一些不足:

- 1.1 - Through management interview, document review and factory tour, the CSR management system was not completed in implementation. For example, the auditee conducted internal checking in July 2018, but it was not included business ethics and environment protection, etc.; also did not identify insufficient social insurance and monthly overtime exceeding law requirement. Management said this was initial audit, some requirement was ignored and they would improve after audit.  
通过管理人员访谈、文件查阅和现场查看, 被审核方的社会责任管理系统在执行上不够完善。例如, 被审核方于2018年7月对社会责任管理体系进行了内部检查, 但是检查中未包含商业道德和环境保护等内容; 同时对于社保购买不足、加班超时等问题没有识别出来。管理人员说这是他们初次审核, 所以某些要求还不太清楚, 审核后他们将改善。
- 1.4 - Through document review and management interview, the auditee established capacity planning procedure. However, reviewing working hours recording, it was noted that production plan was not too effective and monthly overtime of sampled workers exceeded limit of law requirement.  
通过文件查阅和管理人员访谈, 被审核方对产能进行规划。但是查看工时记录, 发现工厂产能计划不是太有效, 抽样员工的月加班都将超过了法律限定。

**Remarks from Auditee:**

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

Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: B

Deadline date:15/01/2019

**GOOD PRACTICES:**

**AREAS OF IMPROVEMENT:**

The auditee posted amfori BSCI Code of Conduct, amfori BSCI Terms of Implementation and poster in local language on the notice board for workers review. Two worker representatives were elected in January 2018 and worker representatives had meeting with the management per two month. According to interview statement with worker representative and workers, they were familiar with workplace-related issues, their labor right e.g. the labor law, work contracts, job description and factory rules. The auditee also provided on-board training including factory rule, OHS, amfori BSCI basic knowledge, etc. The auditee established written grievance procedure such as using suggestion boxes, worker representative and directly telling their supervisor. However, gaps had been identified in implementation:

被审核方已经将amfori BSCI行为守则、amfori BSCI实施条款和海报的当地语言版张贴在通告栏上供员工查阅。两名员工在2018年1月选举为员工代表, 代表每两个月和管理层开会。根据员工代表及员工的访谈信息, 员工代表以及员工都很清楚工厂场所相关信息, 以及员工的劳工权利, 例如劳动法、劳动合同、工作描述以及厂纪厂规等。被审核方也给员工提供入职培训(含厂规厂纪、职业健康安全、amfori BSCI基本知识等)。被审核方已建立了书面的的申诉程序, 员工可通过意见箱、员工代表或直接告诉主管等方式提供投诉。但也发现工厂执行上不足:

- 2.2 - The auditee defined long-term goals to protect workers according to the amfori BSCI values and principles or its amfori BSCI performance including employing workers, workers involvement, OHS, etc. but these goals did not reflect a step-by-step approach toward sustainable improvements and workers & workers representatives did not involve in defining these goals.  
被审核方有根据amfori BSCI价值和原则或其amfori BSCI表现去定义长期的目标去保护员工, 其中包含雇佣员工、员工参与、职业健康安全等。但是该长期目标没有反映出按部就班的可持续改进方法, 工人和工人代表也没有参与确立这些目标。
- 2.5 - The auditee did not establish grievance mechanism for stakeholders such as local communities, schools, suppliers, surrounding factories, etc. 被审核方没有建立关于利益相关方的投诉机制, 如当地社区、学校、供应商、周围工厂等。

**Remarks from Auditee:**

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established policies to guarantee the rights of freedom of association and collective bargaining. Through workers and worker representative interview, they were not limited or other unfair treatment by the auditee on forming, joining and voting for a legal worker organization and collective bargaining. No strike, association happened in the past of one year. Worker representatives could access to workers and workers were free to meet and discuss workplace issues in the facility during their break and before or after work.</p> <p>被审核方建立起了政策去保证自由结社和集体谈判的权利。通过员工和员工代表访谈,被审核方对于员工成立、参加和投票一个合法工人组织和集体谈判没有任何限制,也没有其他的不公平对待。过去一年来,没有罢工、结社的情况发生;员工代表在休息时间和上下班期间可以自由的会见员工并讨论工作场所问题。</p>	
<b>Remarks from Auditee:</b>	
Performance Area 4 : No Discrimination	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established written policy against discrimination behavior including no discrimination based on age, race, gender, marriage status, pregnancy status, HIV or hepatitis B testing at hiring. Through worker interview and document review, they never were discriminated and they could appeal their suggestion or grievance to plant manager or worker representative; in the process of recruitment, it was not discriminated by age, gender and region; in the process of working such as leave, overtime, training, promotion, no discrimination happened.</p> <p>被审核方建立书面的反歧视程序,包括在招聘时不可以涉及关于年龄、种族、性别、婚姻状况、怀孕测试、爱滋病、乙肝携带者等不招聘的规定。通过工人访谈和文件查阅,他们从来都没有被歧视,他们可以将他们的建议或者是不满告诉厂长或者是员工代表;在招聘过程中,不会因为年龄、性别、地域差异而歧视员工;在工作中如请假、加班、培训和晋升,从来没有歧视发生。</p>	
<b>Remarks from Auditee:</b>	
Performance Area 5 : Fair Remuneration	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: B	Deadline date:15/10/2019
<b>GOOD PRACTICES:</b>	
<p>The auditee collected local good price, and calculated possible gaps existing between the actual remuneration and the fair remuneration figure. 被审核方收集当地物价信息,并计算以识别其实际支付的工资和公平需求工资之间的差距。</p>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established wage rule, annual leave rule, sick leave rule and private affair leave. During audit, through reviewing payment records from September 2017 to August 2018 from 12 sampled workers, it was noted that wage was calculated by monthly rate and minimum wage was paid RMB 1800 per month with equivalence to RMB 10.34/hour (local minimum wage RMB 1510/month with equivalence to RMB 8.68/hour before 1 July 2018; it was adjusted to RMB1720/month with equivalence to RMB 9.89/hour after 1 July 2018); overtime compensation from Monday to Friday was paid 1.5 time rate of normal working hour and 2.0 time rate of normal working hours at Saturday( no overtime was applied at Sunday and statutory holiday). Wages were paid on or before 30th of each month for previous month by cash. Total wage was including basic wage, overtime compensation and no any deduction from wages was found in the factory except individual part of social insurance. However, there were still some gaps in implementation:</p> <p>被审核方建立薪资、年假、病假和事假制度。审核期间,查阅随机抽样的12名员工从2017年9月到2018年8月期间的工资记录,该记录显示所有的员工工资都是月薪,最低工资是1800元每月相当于每小时10.34元,(在2018年7月1日前当地最低工资每月1510元相当于每小时8.68元;2018年7月1日后调整为每月1720元相当于每小时9.89元);周一到周五加班费是基本工资的1.5倍,周六加班是基本工资的2倍(周日和法定假日没有加班);每月30日前或者当天通过现金支付上月的工资;工人的总工资包含基本工资、加班费,除了个人需要缴纳的社保外,没有任何扣款被发现。尽管如此,在实践中仍然存在一些不足:</p> <p>5.5 - Insufficient social insurance participated. Through reviewing social system from October 2017 to September 2018, it was showing that 70 out of 80 employees did not participate in five-type social insurance (basic endowment insurance, employment injury insurance, basic medical insurance, unemployment insurance, and maternity insurance); 8 workers who entered the factory less than one month could not participate social insurance and no workers reached retired age. Through worker interview, because of paying for too much additional fee of social insurance, so they unwilling to buy; management said they would buy social insurance for all workers only if they would. Reference law: PRC Labor Law article 72 &amp; 73. Remark: Zhongshan Claler Garments Co., Ltd purchased social insurance for 93 workers and only 10 workers were belong to branch factory.</p> <p>社会保险参保不足。通过查看从2017年10月到2018年9月社保系统,显示被审核方80人中有70人没有参加五险(基本养老保险、工伤保险、基本医疗保险、失业保险、生育保险);其中8名员工都是入职不到一个月,无达到退休年龄的员工。通过员工访谈,员工他们认为需要支付太多额外的社保费用,所以他们不愿意购买。通过管理者访谈,工厂愿意为所有的员工购买社保只要他们愿意买。参考《中华人民共和国劳动法》第72和73条。备注:中山市喜来乐服饰有限公司共为93人购买社保,其中10人属于分厂的。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 6 : Decent Working Hours</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: D	Deadline date:15/10/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established working hours system and it defined normal working hour was 8 hours per day and 5 days per week, rest day on Saturday and Sunday. Through factory tour and worker interview, the auditee used fingerprint attendance system. Through document review and worker interview, one shift was applied for all employees and normal working hour was 08:00-12:00, 13:30-17:30, overtime 2 hours from 18:30-20:30 and arranged for 8 hours per Saturdays. Through reviewing working hours from 1 September 2017 to audit date from 12 sampled workers, the max daily overtime was 2 hours, max weekly overtime was 16 hours, at least one day off after 6 days consecutive working days was guaranteed. However, there were still some gaps in implementation:</p> <p>被审核方建立了考勤制度, 其中规定员工每周法定工作五天, 每天正常工作时间8小时, 周六、日为休息日。通过现场走访和员工访谈, 被审核方使用指纹考勤系统; 通过文件查阅和员工访谈, 所有员工都是一班制, 正常工作时间是 08:00-12:00, 13:30-17:30; 晚上加班2小时(18:30-20:30), 周六通常安排加班8小时; 通过查看随机抽样12名员工从2017年9月1日到审核当天的工时记录, 员工最大日加班为2小时, 最大周加班为16小时, 连续工作6天至少休息1天。尽管如此, 在实践中仍然存在一些不足:</p>	
6.2 -	<p>Working hours recording system did not have capacity to control excessive working hours and the auditee did not make plan to reduce the overtime hours step by step. It was noted that 12 sampled monthly overtime hours of workers were exceeding 36 hours in these months from 1 September 2017 to audit date: max monthly overtime was up 66 hours in December 2017, up to 64 hours in April 2018, up to 68 hours in August 2018, up to 32 hours from 1 October 2018 to audit date. Manager said they had working hours controlling plan and normally they needed to arrange production based on order status and it was difficult to keep monthly overtime within 36 hours; they needed to spend more time to improve, because it needed to consider some aspects such as production cost, and delivery time, etc. Through worker interview, they did not know about working hour control plan and their supervisor told them whether it was overtime on night or Saturday. Reference law: PRC Labor Law article 41.</p> <p>工时管控系统不能有效控制额外的加班, 被审核方也没有建立逐步减少加班工时的计划。通过查看12名抽样的员工从2017年9月1日至审核当天考勤记录发现所有月加班都超过了36小时: 2017年12月员工最大月加班为66小时, 2018年4月员工最大月加班为64小时, 2018年8月员工最大月加班为68小时, 从2018年10月1日到审核当天最大月加班为32小时。管理人员说他们有工时控制计划, 通常他们都是需要根据订单的情况来安排生产, 但是要控制月加班在36小时以内是非常困难的; 他们需要更多时间去改善, 因为这些涉及到许多方面如生产成本和交期等。通过员工访谈, 工人不知道工时控制计划, 如果有晚上或者周六有加班, 他们的主管会告诉他们。参考《中华人民共和国劳动法》第41条。</p>
<b>Remarks from Auditee:</b>	
<b>Performance Area 7 : Occupational Health and Safety</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:15/01/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>Overall, the auditee observed OHS law requirement and appointed Mr. Jianxing Chen / Commissioner for implementing OHS business. The auditee conducted OHS risk assessment and it included main workshops, special people and disease. Fire drills were conducted twice (including March 2018 and September 2018). No any chemicals except sewing machine oil was used. All fire facilities could meet law and regulation requirement; sufficient fire extinguishers, fire hydrant, fire alarm were equipped and kept monthly inspection. No routes were blocked; all routes and exit doors were remarked clearly; evacuation plans were posted on workplace. One cargo lift was applied in this factory and conducted annual inspection in April 2018 and all inspection results were normal. The auditee provided first aid kit in each workshop and three first aiders were trained. The auditee provided bottle drinking water in this workshop. Washing room condition were well and cleaner was responsible for cleaning each day. The auditee did not provide dormitory, canteen and transportation for workers; all workers lived near the factory. However, there were still some gaps in implementation:</p> <p>总体上, 被审核方遵守职业健康与安全法规的要求, 并且指派了总监陈建星负责职业健康安全事宜。被审核方进行了职业健康的风险评估, 其中包含了重要的岗位、特种人群和疾病。过去一年中, 消防演习进行了两次(2018年3月和2018年9月)。在生产过程中, 除了使用到机油外没有用到其他化学品。所有的消防设施都是满足法规的要求, 如灭火器、消防栓、警铃等足够, 并且每月保持检查。通道没有被堵塞, 并且都清晰的有疏散标示、出口标示等; 并张贴疏散计划。被审核方使用了一部货梯, 并于2018年4月进行了年检, 其检查结果都是正常的。每个车间都配备了医疗箱, 有三名参加培训的急救员在车间。被审核方提供了桶装水在生产车间。车间洗手间条件良好, 每天都有人打扫。被审核方没有给工人提供宿舍、饭堂和交通工具; 所有的工人都是住在工厂附近。尽管如此, 在实践中仍然存在一些不足:</p>	
7.2 -	<p>Through worker interview and document review, 70 out of 80 workers (including 8 out of 70 workers entered the factory less than one month ) did not participate in any accident insurance including employment injury insurance. Management said the factory did not consider accident insurance because main processes were so sample and had no dangerous working station. Reference law: Social Insurance Law of the People's Republic of China, article 33.</p> <p>通过员工访谈和文件查阅, 被审核方80人中有70人(含8名入职不到一个月的新员工)没有参加任何意外保险(含工伤险)。管理人员说工厂主要的工序比较简单, 没有危险岗位, 故没有考虑购买意外险。参考《中华人民共和国社会保险法》第33条。</p>
7.8 -	<p>The auditee developed accident and emergency procedures including fires, floods, heatstroke, typhoons and so on, but not displayed it in a way that was clear for workers, and workers and their representatives were not involve in developing this procedures.</p> <p>被审核方制定了意外和应急程序, 其中包含了火灾、水灾、中暑、台风等, 但是没有将其以工人清晰可见的方式展示出来, 同时也没有邀请工人和工人代表参与开发。</p>
7.17 -	<p>Through factory tour, all sewing machines did not install protective hand facilities and preventing broken needle facilities. Management said they were ignored the requirement. Reference law: General rules for designing the production facilities in accordance with safety and health requirements (GB5083-1999), article 6.1.2.</p> <p>通过现场查看, 所有的针车都没有安护手器和防断针装置。管理人员说他们不知道该要求。参考《生产设备安全卫生设计总则》(GB 5083-1999)第6.1.2条。</p>
<b>Remarks from Auditee:</b>	



<b>Performance Area 8 : No Child Labour</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established social policy and procedures on no child labor, age verification mechanism, recruitment procedures and remedial procedures in case children were found. Moreover, the auditee maintained the personnel files including profiles of workers and copies of age documents for all workers. Through documents review, factory tour and worker interviews, no child labor were found working in the factory currently.</p> <p>被审核方建立了有关禁止使用童工的社会责任政策和程序、年龄核对机制、招聘程序以及应对万一发现童工的补救政策等, 同时被审核方也保留了所有员工的人事档案以及年龄文件的复印件等。通过文件审核、现场走访以及员工访谈, 没有发现工厂有使用童工。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 9 : Special protection for young workers</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established the written procedure and requirement for protection of young workers and it defined that the factory would conduct registration, regular health examination and OHS training if applying the young workers. The auditee also conducted risk assessment about young workers. Through factory tour, worker interview and document review, no young workers were applied in this factory and all workers were above 18 years old. The youngest workers were born on 14 August 2000 and employed on 8 October 2018.</p> <p>被审核方建立了书面的程序和要求以保护未成年工, 其中规定如果使用未成年工, 需要进行用工登记, 定期进行体检和职业健康培训。被审核方也进行了未成年工的风险评估。通过现场查看, 员工访谈和文件查阅, 被审核方未雇佣未成年工且全部年龄都超过18周岁; 最年轻的员工出生于2000年8月14日且在2018年10月8日入职。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 10 : No Precarious Employment</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established employment procedure and it included signing labor contract, probation period, training, etc. Through reviewing personal profile and labor contract from 12 sampled workers, the auditee signed the labor contract with workers for three years without probation period. Moreover, labor contract defined working hour, basic wage, payment date, training, labor protection, etc. No precarious employment was applied in this factory such as no dispatching workers, no temporary workers, and no student workers.</p> <p>被审核方建立了雇佣程序, 其中包含规定了签订劳动合同、试用期、培训等内容。通过查看抽样的12名员工的入职档案和劳动合同, 被审核方与工人签订了3年劳动合同(无试用期); 另外, 劳动合同还规定了工作时间、基本工资、发工资时间、培训、劳动保护等内容。被审核方没有不稳定的雇佣关系, 如没有使用派遣工、临时工、学生工等。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established policy of prevent bonded labor and disciplinary procedure based on amfori BSCI requirements. During this audit period, there was no privacy agency labor and no prison labor found. Workers at workplace moved freely, and no depositing personnel certificates, no abuse and harassment case found and no workers was subjected inhumane or degrading treatment, corporal punishment, mental or physical coercion or verbal abuse.</p> <p>被审核方基于amfori BSCI要求建立了防止强迫劳工的政策和惩戒程序。在这次审核中没有发现有劳务派遣工、囚工。工人在工作期间活动自由, 没有扣押证件、没有侮辱人格、骚扰等情况; 也没有工人受到不人道或有辱人格的待遇、受到体罚、精神上或身体上压迫或言语虐待。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:15/03/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>The auditee established the policy and procedure of environment protection, and Mr. Jianxing Chen /Commissioner was directly responsible for the environment improvement. Through factory tour, only leftover material was produced in the cutting process. No chemicals except a little machine oil was applied in this factory. Remark: no obvious wastes such as wastewater, waste air was produced in manufacturing, so no discharge permit was applied in this factory and PA 12.3 was rated as NA. However, gaps have been identified in implementation:                  被审核方已经建立了环境保护的政策和程序,同时总监陈建星直接为环境改善负责人。通过现场查看,只有开料过程中有一些边角料产生;除了机油没有其他的化学品运用在现场。备注:生产过程中没有明显的废弃物如废水、废气等,故不需要排污许可证,PA 12.3为NA。但是,在实践中仍然存在一些不足:</p>	
<p><b>12.1 -</b> The auditee did not provide Environmental Impact Assessment records such as filling EIA registration form. Reference law: PRC Environmental Impact Assessment Law Article 16 and 22.                  被审核方没有提供环境影响评价记录,如填写环境影响登记表。参考《中华人民共和国环境影响评价法》第16,22条。</p>	
<b>Remarks from Auditee:</b>	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - 135664] Audit Date: 16/10/2018 PA Score: A	Deadline date:15/03/2019
<b>GOOD PRACTICES:</b>	
<b>AREAS OF IMPROVEMENT:</b>	
<p>Through management interview, document review, etc., it was noted that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise; the auditee kept accurate information regarding its own activities, structure and performance. No any false document or information were found during audit. For this audit, this finding The auditee established the written rule on the consequence for supervisors who disregard the ways where personal information needs to be treated with respect. However, gaps have been identified in implementation:                  通过管理人员访谈、文件查阅等,审核发现被审核方积极反对在其企业活动中出现的任何贪污、勒索或挪用行为、或任何贿赂形式;被审核方保留了关于其活动、架构和绩效的准确信息;审核中没有发现任何虚假的资料或者是信息;被审核方已经建立了书面规定如果管理人员违反了个人信息保密规定的相关处理。但是,在实践中仍然存在一些不足:</p>	
<p><b>13.2 -</b> The auditee did not update address information of enterprise constitution. Through management interview and document review, the enterprise constitution which was used for business license registration shown the address "The 2-5F, No. 72, Dongsheng West Road, Xiaolan Town, Zhongshan", but actual address of factory were included whole buildings including 1-5F. Reference law: Regulations of PRC for controlling the registration of enterprises as legal persons Article 17.                  被审核方没有更新企业章程中的地址信息。通过管理者访谈和文件审核发现,企业章程(该章程用于营业执照注册)显示的地址是"中山市小榄镇东生西路72号二至五楼",但是实际使用是包含整栋建筑(一至五楼)。参考《中华人民共和国企业法人登记管理条例》第17条。</p>	
<b>Remarks from Auditee:</b>	

**Summary**



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	16/10/2018	135664	D	B	A	A	B	D	A	A	A	A	A	A	A	C

Producer Photos



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

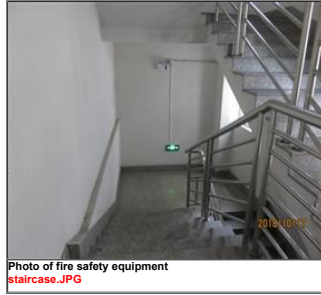


Photo of fire safety equipment staircase.JPG



Photo of the inside of the main production hall inspection workshop.JPG



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

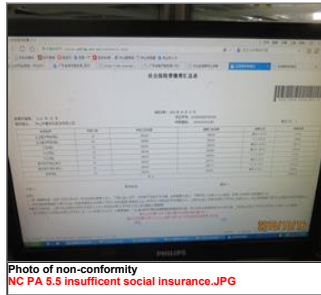
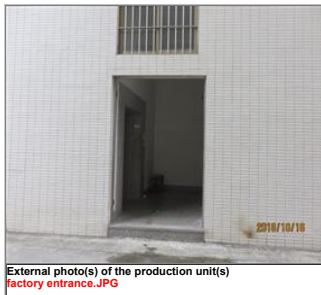


Photo of non-conformity NC PA 5.5 insufficient social insurance.JPG



Photo of the inside of the main production hall occupation hazard factor notice and PPE warning posted in workshop.JPG



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

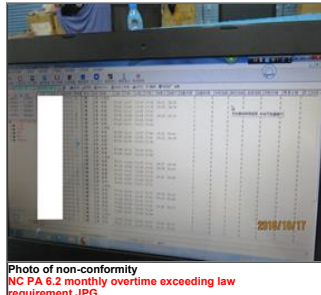


Photo of non-conformity NC PA 6.2 monthly overtime exceeding law requirement.JPG



Photo of the inside of the main production hall packing workshop.JPG



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



Photo of non-conformity NC PA 7.47 no preventing broken needle facilities of sewing machines.JPG



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



Photo first aid facilities  
first aid kit.JPG



Photo of non-conformity  
NC PA 7.17 no protective hand facilities for sewing  
machines.JPG



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



Photo of fire safety equipment  
emergency exit and emergency light.JPG

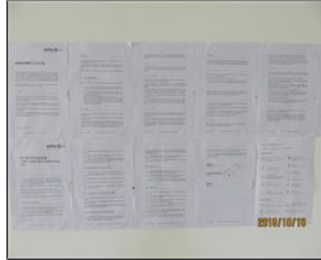


Photo of the code of conduct on display  
amfori BSCI CoC.JPG



Photo of the inside of the main production hall  
sewing worker.JPG

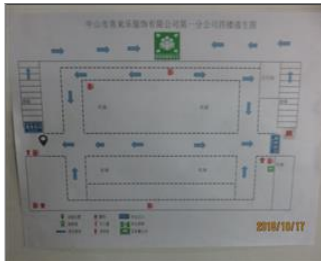


Photo of fire safety equipment  
escape map posted in workshop.JPG



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



Photo of the inside of the main production hall  
steel glove for cutting worker.JPG



Photo of fire safety equipment  
escape route.JPG



Photo of the inside of the main production hall  
cargo lift.JPG



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



Photo of fire safety equipment  
fire alarm.JPG



Photo of the inside of the main production hall  
cutting workshop.JPG



Photo of the inside of the main production hall  
warning sign in the warehouse.JPG



Photo of fire safety equipment  
fire extinguisher.JPG



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



Photo of the sanitary facilities  
drinking water.JPG



Photo of fire safety equipment  
fire extinguishers.JPG



Photo of the inside of the main production hall  
explosion proof lamp.JPG



Photo of the sanitary facilities  
toilet.JPG



Photo of fire safety equipment  
fire hydrant testing.JPG



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



Photo of the sanitary facilities  
toilets.JPG



Photo of fire safety equipment  
fire hydrant.JPG