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Auditee :	<b>Ningbo Cliff Tools Co., Ltd.</b>
Audit Date From :	<b>29/08/2018</b>
Audit Date To :	<b>29/08/2018</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>Jerry Chen(Lead)</b>
Auditing Branch (if applicable) :	<b>TUV Rheinland China</b>

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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																																							
<p><b>A</b> <b>Very Good</b></p>	<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> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <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	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
A	A	A	A	A	A	A	A	A	A	A	A	A																													
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A	A	A	A	A	A	A	B	B	B	B	B	B																													
<p><b>B</b> <b>Good</b></p>	<ul style="list-style-type: none"> <li>• Maximum 3 Performance Areas rated C</li> <li>• No Performance Areas rated D or E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <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	<p>The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.</p>
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B	B	B	B	B	B	B	B	B	B	C	C	C																													
<p><b>C</b> <b>Acceptable</b></p>	<ul style="list-style-type: none"> <li>• Maximum 2 Performance Areas rated D</li> <li>• No Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <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	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
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																													
<p><b>D</b> <b>Insufficient</b></p>	<ul style="list-style-type: none"> <li>• Maximum 6 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <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>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	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	<p>The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.</p>
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																													
<p><b>E</b> <b>Unacceptable</b></p>	<ul style="list-style-type: none"> <li>• Minimum 7 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1" style="width: 100%; text-align: center;"> <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	<p>amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.</p>
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																													
<p><b>Zero Tolerance</b></p>	<p>A Zero Tolerance issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)</p>	<p>Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.</p>																																							

**Main Auditee Information**



Name of producer :	<b>Ningbo Cliff Tools Co., Ltd.</b>		
DBID number :	<b>361733</b>		
Audit ID :	<b>132321</b>		
Address :	<b>1F-3F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District Ningbo</b>		
Province :	<b>Zhejiang</b>	Country :	<b>China</b>
Management Representative :	<b>Qinmei Ren</b>		
Contact person:	<b>Qinmei Ren</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Plastic Industry</b>	Product group :	<b>Plastic and articles thereof</b>
Product Type :	<b>Paint Tray</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) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by : 29/08/2019	

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

**Executive summary of audit report**

Ningbo Cliff Tools Co., Ltd. (宁波克里夫工具有限公司) was located at 1F-3F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District, Ningbo, Zhejiang, China (中国浙江省宁波市北仑区大碶龙潭山路98号5幢1号1-3层) and established on 2 July 2015. There were three 3-storey production buildings and one 4-storey production building in the plant and all these buildings were owned by the landlord named Chengfa (Ningbo) Industry Co., Ltd (成发(宁波)实业有限公司) the main products of landlord were Toys. The auditee rent one 3-storey production building from the landlord and other buildings were used by the landlord. For the 3-storey production building rent by the auditee, part of the 1st floor, part of the 2nd floor and the whole 3rd floor were used by the facility, the total area was around 5606 square meters. The the left part of the 1st floor was leased to Ningbo Huake Lianzhong Automation Co., Ltd. (宁波华科联众自动化有限公司) and the main products were Automation Tools, the left part of the 2nd floor was leased to Ningbo Beilun Zhongmai Hardware Manufacture Co., Ltd (宁波市北仑众麦五金制造有限公司) and the main products were Expansion Link. The production area of the auditee was separated from other facilities and no production workers were shared. The rent contract and business licenses of all these facilities were provided for review, all these documents were valid and there was no business relationship between the auditee and other facilities, thus the other three facilities in the same plant were not included in audit scope. No canteen or dormitory was provided by the auditee.

The auditee was specialized in the manufacture of paint Tray. Main production activities included material crushing & mixing, injection, assembly and packing. The plastic parts and packaging materials were purchased from suppliers, no production process was subcontracted. There was no apparent peak or low season in the facility. All the employees, including management staff and production workers were directly hired by the facility, no part time workers or temporary workers were used. Moreover, no other supporting staff was hired.

It was a fully-announced full audit. The facility was cooperative and active throughout the whole audit, all the requested documents were provided in a timely manner, full access to facility walk-through and employee interview were granted, and photo-taken of necessary evidences for the audit were permitted. During the closing meeting, the auditor communicated fully with facility representative on detected non-compliances, the facility representative were positive and committed to make continuous improvement according to amfori BSCI requirement.

**Remark:**

The address in business license was 北仑区大碶龙潭山路98号5幢1号1-2层 in Chinese, i.e. 1F-2F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District in English. However, the confirmed address in English 1F-3F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District, Ningbo, Zhejiang, China, i.e. 中国浙江省宁波市北仑区大碶龙潭山路98号5幢1号1-3层 in Chinese due to address in business license not updated after the expanded floor.

**Ratings Summary**



<b>Auditee's background information</b>			
Auditee's name :	<b>Ningbo Cliff Tools Co., Ltd.</b>	Legal status :	<b>Limited Company</b>
Local Name :	<b>宁波克里夫工具有限公司 (91330206340478780R)</b>	Year in which the auditee was founded :	<b>2015</b>
Address :	<b>1F-3F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District</b>	Contact person (please select) :	<b>Qinmei Ren</b>
Province :	<b>Zhejiang</b>	Contact's Email :	<b>klfcaigou@126.com</b>
City :	<b>Ningbo</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>None</b>
GPS coordinates :	<b>N 29°53'6"; E 121°45'59"</b>	Total turnover (in Euros) :	<b>1000000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>70.00</b>
Industry :	<b>Plastic Industry</b>	Of which domestic market % :	<b>30.00</b>
If other, please specify :		Production volume :	<b>500,000 pieces/ month</b>
Product Group :	<b>Plastic and articles thereof</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :		Lost time injury calculation cost :	<b>Yes</b>
Product Type :	<b>Paint Tray</b>		

<b>Auditee's employment structure at the time of the audit</b>			
Total number of workers :	<b>23</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>11</b>	<b>12</b>	
In management positions	<b>0</b>	<b>1</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>11</b>	<b>9</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>11</b>	<b>12</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 - 132321] Audit Date: 29/08/2018 PA Score: D

Deadline date:28/08/2019

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

The auditee had set up a management system to implement the amfori BSCI Code of Conduct. Social accountability policy and procedures were established. The auditee conducted internal audit and management review on its social performance once per year to monitor the system's effectiveness. The latest internal audit and management review were conducted on 1 March 2018. Supplier Social Accountability Control Procedure was established and the auditee monitored main suppliers' social accountability performances through assessment. The amfori BSCI Code of Conduct and TOI were sent to the main suppliers and were signed back. However, gaps had been identified in implementation.

被审核方建立了管理体系来执行amfori BSCI行为守则,建立了社会责任政策和程序。被审核方每年一次就其社会责任的表现进行了内部的审核以及管理层的评估,以确保体系运行的有效性,最近一次内审和管理评审的时间为2018年3月1日。供应商社会责任控制程序已建立,被审核方通过审核的方式监督了主要供应商的社会责任表现。amfori BSCI供应商行为守则以及实施条款都发送给了主要供应商,且签署回传。然而,工厂在实施中仍存在差距。

- 1.1 - The facility had established written policy and procedure to implement amfori BSCI Code of conduct and legal requirements, but they were not actually carried out effectively, as non-conformances were detected in some of the PAs. (overtime working hours exceeding legal requirement, insufficient social insurance coverage and no effective prevention/treatment on occupational health hazard factors). The facility management explained that because employees were not stable and they did not want to participate in social insurance, thus currently, not all employees were covered by social insurance. Overtime work was inevitable because workers were not sufficient. Interviewed workers also reported that overtime work was voluntary and they wanted to conduct more overtime to earn more money. Moreover, the facility management was not familiar with the amfori BSCI and legal requirement on occupational health examination, after current audit, they would improve step by step.

工厂已经建立了书面的政策和程序来执行amfori BSCI行为守则和相关法规要求,但是这些政策和程序没有实际有效落实,因为部分PA发现了不符合项(加班超时,社保覆盖不足,以及没有有效的职业病危害防治措施)。管理人员解释说由于员工流动性比较大,且员工自己也不愿意参加社保,因此社保没有覆盖全部员工。加班时间是不能避免的因为员工不够。访谈员工表示加班都是自愿的,他们需要多加班来赚取更多的工资。同时工厂管理人员不太清楚amfori BSCI和法律对于职业病体检的要求,这次审核之后他们会逐步改善。

- 1.4 - There was procedure to evaluate workforce capacity. However, the facility did not organize effective workforce capacity plan to meet the expectations of the delivery order, which led to workers excessive monthly overtime hours. The maximum monthly overtime working hours reached 76 hours in November 2017. Facility management explained that established production plans were adjusted according to production orders in each period, and workers also wanted to conduct more overtime hours for higher salary.

工厂有建立产能评估程序,但未安排有效的产能计划以满足订单交付的要求,导致员工有月加班超时的情况,最大月加班工时数在2017年11月达到76小时。工厂解释说原先制定的生产计划根据各个阶段的生产订单进行了调整,员工也想要多加班来获得更高的工资。

**Remarks from Auditee:**

Accept

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

Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A

Deadline date:28/09/2018

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

There was one freely elected worker representative in the factory. Confirmed through worker representative interview and worker interview, they knew how to exchange information on workplace issues with management. They could dialogue and negotiate each other freely. Meetings between worker representative and management were conducted regularly. The factory provided relevant training about rights and responsibilities, H & S and workplace rules and grievance mechanism etc., the interviewed workers knew their rights and responsibilities. Employees might raise their grievances through suggestion box, worker representative and directly communicated the senior management, there was no any complaint occurred in the past 12 months based on the complaint records. However, gaps had been identified in implementation.

工厂自由选举了一名员工代表。通过员工代表以及员工访谈确认,他们知道如何就工作场所的问题和管理层沟通。他们可以自由对话和协商,员工代表和管理层之间的会议定期展开。工厂给员工提供了关于权利和义务、健康安全、厂纪厂规和申诉机制等的相关培训,访谈的员工知道他们的权利和义务。员工可以通过意见箱、员工代表和直接与高层管理沟通的方式去提出申诉,根据投诉记录,过去12个月并没有投诉的发生。然而,工厂在实施中仍存在差距。

- 2.5 - The suggestion box was installed beside main entrance on the 1st floor of the production building, which might influence the confidential complaint. Moreover, no using guidance was posted nearby.

工厂意见箱安装在生产楼一楼主入口边上,可能会影响申诉的保密性,并且旁边没有张贴使用指导。

**Remarks from Auditee:**

Accept



<b>Performance Area 3 : The rights of Freedom of Association and Collective Bargaining</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The factory had established policies to guarantee the rights of freedom of association and collective bargaining. The worker representative management procedure was established. One worker was elected as worker representative by all employees on 16 January 2018 freely. The role of worker representative was communicated with all employees. The factory conducted communication meeting with worker representatives about workers voice once per three months. There was no trade union in the factory. 工厂建立起了政策去保证自由结社和集体谈判的权利。工厂建立了员工代表管理程序。一名员工于2018年1月16日被选举为员工代表。员工代表的职责已传达给所有员工。工厂每三个月与员工代表就员工的心声进行一次沟通会议。工厂未成立工会。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 4 : No Discrimination</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The facility had established non-discrimination procedure, which defined no limit on age, race, gender, marriage status, etc. was for recruiting, firing, promoting, training, pay social benefit, etc. Pregnant women workers and worker representatives were also not discriminated. Workers could directly tell senior manager if there was discrimination issue. Through worker interview and site observation, no discrimination happened in the process of working. 工厂建立了反歧视控制程序, 该程序规定工人在招聘、解雇、晋升、培训、提供福利等方面不会因为年龄、种族、性别、婚姻状态等受到限制; 怀孕女工和员工代表也不会受到歧视。如果有歧视事件出现, 员工可以直接投诉给高级管理层。通过员工访谈和现场走访, 工作过程中没有歧视现象出现。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 5 : Fair Remuneration</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: B	Deadline date:28/08/2019
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The facility collected local minimum wage data from the website of local government. The local minimum wage was RMB 2100 per month (RMB 11.55 per hour) since December 1, 2017, and RMB 1860 per month (RMB 10.69 per hour) before December 1, 2017. Payroll records from August 2017 to July 2018 for review. The auditor selected 6 sampled workers' payroll records from November 2017, March 2018 and July 2018 for review. It was noted that the paid lowest basic wage was RMB 2200 per month. Wage was paid to employees before 28th of each month for the previous natural month in cash. Workers are paid at least 150%, 200% and 300% of the regular wages for the overtime conducted in regular days, rest days and statutory holidays, respectively. Payslip was provided to employees. Social insurance receipts of last 12 months were provided for review. However, gaps had been identified in implementation. 工厂定期从当地政府网站收集当地的最低工资数据。自2017年12月1日起, 当地的最低工资为人民币2100元每月(每小时人民币11.55元), 在2017年12月1日前, 当地的最低工资为人民币1860元每月(每小时人民币10.69元)。工厂提供了2017年8月至2018年7月的工资表来查看。审核员在2017年11月, 2018年3月, 2018年7月中各自抽取了6名员工的工资信息来查看。发现工厂支付的最低基本工资为人民币2200元每月。工厂在每月28号之前以现金的形式支付员工上个自然月的工资。员工在平时加班, 周末加班和节假日加班, 工厂按平时工资的150%, 200%和300%支付。工厂给员工提供了工资条。过去12个月的社保缴费发票提供了查看。然而, 工厂在实施中仍存在差距。 <b>5.4 -</b> Facility management was aware of fair remuneration and had collected the local legal minimum wage document. But the facility did not update local living cost data after local minimum wage being adjusted in December 2017. 工厂管理人员了解公平报酬, 并且收集了当地的法定最低工资文件。但工厂没有在当地生活工资于2017年12月调整后更新当地的生活成本数据。 <b>5.5 -</b> The facility did not provide social insurance to 100% of the employees. The social insurance payment records from August 2017 to July 2018 were provided for review, there were 23 employees employed in July 2018, there was retired worker and subcontractor workers, no temporary worker was used (no new employee was hired in July 2018, no new employee was hired in August 2018). Per the social insurance receipts of July 2018, 17 out of 23 employees were not provided with work-related injury insurance, maternity insurance, retirement insurance, medical insurance and unemployment insurance. The facility management explained that social insurance were paid according to employees' personal willingness. The interviewed employees reported that they were reluctant to participate in social insurance because they could not enjoy pension funds at working city after retirement, and they had participated in new rural insurance in their hometown, thus they did not want to pay the personal afford part. But the actual number of employees participating in new rural insurance could not be calculated as related receipts were kept by employees. Remark: No commercial injury insurance was provided by the facility. (Reference law: Labor Law of P.R.C, Article 72&73.) 工厂没有全员参加社保。工厂提供了2018年8月到2018年7月的社保缴费记录。2018年7月工厂有23名员工在职, 工厂没有退休员工和劳务派遣工, 也没有临时工。(2018年7月工厂没有招聘新员工, 2018年8月没有招聘新员工)。根据2018年7月的社保缴费记录, 23名员工中的17名员工没有参加工伤保险、生育保险、养老保险、医疗保险和失业保险。管理人员说工厂缴社保是根据员工的个人意愿的。受访员工表示他们不愿意参加社保是因为他们退休后无法在工作城市享受养老金, 并且在老家参加了新农保险, 所以他们不愿意支付个人承担部分。但是由于相关发票由员工自己保留, 无法计算实际参加新农保险的人数。备注: 工厂没有给员工提供商业意外险。(参考法律法规:《中华人民共和国劳动法》第72条和第73条)	
<b>Remarks from Auditee:</b> Accept	

**Performance Area 6 : Decent Working Hours**

Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: D

Deadline date:28/08/2019

**GOOD PRACTICES:**

None

**AREAS OF IMPROVEMENT:**

Working hours management procedure stipulated that the workers regular working hours were 8 hours a day and 40 hours a week. The facility had established overtime working hours control procedure, the procedure required that overtime working hours should be controlled within 3 hours a day and 36 hours a month. All the employees worked from 8:00 to 17:00 with a lunch break from 11:00 to 12:00. Finger printing system was used to record working hours. Time records from 1 August 2017 to the audit day (29 August 2018) were provided and 6 samples were randomly selected for review, the maximum overtime hours were 2 hours per workday and 18 hours per week, the 7th day of rest was guaranteed for all employees. Though most sample workers' monthly overtime hours were over the legal limited 36 hours per month, from the holistic approach, it did not impact other performance areas. No one looks tired in the working time, no worker injured due to the overtime working during the last 12 months, no forced labor was noted, all the overtime hours were voluntary, no subcontractor or home worker noted. However, gaps had been identified in implementation.

工作时间管理程序规定员工的正常工作时间为每日8小时每周40小时。工厂制定了加班工作时间控制程序，该程序要求员工的日加班不得超过3小时，月加班不得超过36小时。所有员工从8:00工作到17:00，中间含从11:00到12:00的午餐休息时间。工厂用指纹打卡系统记录员工的工作时间。从2017年8月1日至审核当天(2018年8月29日)的考勤提供了查看，审核员随机选取了6名抽样员工，发现员工工作日每天最多加班2小时，每周最多加班18小时。所有员工都保障了第七天休息。尽管大部分选择样本员工的月加班时间都超过了法律规定的36小时，但从整体来看，其他受审核部分没有受到影响。在工作时间内没有人看上去很疲惫，过去12个月也没有人因为加班发生工伤事故，并且所有的加班都是员工自愿的，没有强迫劳工，也没有发现家庭工。然而，工厂在实施中仍存在差距。

- 6.2 - The factory did not have effective overtime control system. Wei Zheng/ HR Staff stated that the factory had established working hour rules, finger printing system was used to record workers' attendance, but they did not establish overtime control planning, workers' overtime hours depended on production task, but one day off per week was guaranteed, the working hours record system couldn't alert when overtime near or over the limits. Through workers interview, the interviewees stated that the workshop director would inform them when overtime was needed, they did not know the overtime limits and how to do when overtime reached the upper limit. Through reviewing the attendance records from 1 August 2017 to the audit day (29 August 2018), the monthly OT working hours exceeded 36 hours in 12 sampled months. 1. As per provided time records of November 2017, the monthly overtime hours for 6 out of 6 randomly selected employees exceeded 36 hours and the maximum were up to 76 hours; 2. As per provided time records of March 2018, the monthly overtime hours for 6 out of 6 randomly selected employees exceeded 36 hours and the maximum were up to 66 hours; 3. As per provided time records of July 2018, the monthly overtime hours for 6 out of 6 randomly selected employees exceeded 36 hours and the maximum were up to 58 hours. 4. As per provided time records of August 2018 (from 1 August 2018 to 29 August 2018), the monthly overtime hours for 6 out of 6 randomly selected employees exceeded 36 hours and the maximum were up to 56 hours. (Reference law: Refer to PRC Labor Act, Article 41)

工厂没有有效的系统去控制加班。郑伟/人事表示工厂有制定工时制度，员工采用指纹打卡系统记录出勤时间，但没有建立加班管控计划，员工的加班时取决于生产任务，但是员工每周休息一天是有保证的，考勤系统没办法预警当其加班时间快超过或已经超过要求时。通过员工访谈，他们表示车间主管有加班安排时会通知员工，他们不了解加班时间的上限及如果达到上限后如何处理。根据工人的2017年8月1日至审核当日(2018年8月29日)的考勤，工人在12个抽样月份的月加班超出了36小时要求。1.根据2017年11月的考勤显示，抽样的6名员工中的6名月加班超过36小时最高达到76小时；2.根据2018年3月的考勤显示，抽样的6名员工中的6名月加班超过36小时最高达到66小时；3.根据2018年7月的考勤显示，抽样的6名员工中的6名月加班超过36小时最高达到58小时；4.根据2018年8月的考勤(从2018年8月1日到29日)显示，抽样的6名员工中的6名月加班超过36小时最高达到56小时。(参考法律法规:《中华人民共和国劳动法》第41条)

**Remarks from Auditee:**

Accept



<b>Performance Area 7 : Occupational Health and Safety</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:28/11/2018
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility had established health and safety management mechanism and identified the main risks associated to the production activities and worked out relevant precautionary measures. Qinmei Ren/ Facility Director was appointed for health and safety issues. At least two exits were available for each floor and safety exit signs were installed, workers knew evacuation routes. All evacuation passages in the workshops were free of obstruction. Production workshop was equipped with adequate firefighting equipment such as fire extinguishers, fire hydrants, fire alarms, emergency lights, safety exit signs and etc. in the workshops, firefighting facilities were inspected monthly. By testing onsite, fire hydrant, emergency light and fire alarm were in good function. The facility conducted fire drills twice a year and the latest time was conducted on 9 August 2018. All of the wires and electrical facilities were posted with warning signs, one competent electrician was responsible for electric safety, electrical facilities were inspected on monthly basis. Annual inspection report for special equipment (one elevator) was provided and there was certificated operator in the facility. Clean drinkable water was available in workshops. Two qualified first aiders were available in the factory and the first aid kits with adequate necessary supplies were provided to employees in production site. Moreover, the facility signed emergency medical service agreement with Beilun Daqi Kaier Hospital. There was no canteen, dormitory or transport provided in the factory, therefore, 7.21, 7.23 and 7.24 were rated as N/A. However, gaps had been identified in implementation.</p> <p>工厂建立了健康安全的管理制度,并识别了生产过程中主要的健康安全风险,且制定了相应的管控措施。任芹枚/厂长受任命负责健康安全。每个楼层有至少2个出口,并且有安装出口标志,员工清楚逃生路线。车间所有的逃生通道畅通。车间内配备了充足的消防设施,例如灭火器、消防栓、应急灯、消防警铃等,消防设施每月检查一次。通过现场测试,消防栓,应急灯和警铃功能良好。消防演习每年举行两次,最近一次于2018年8月9日进行。所有电线和电气设施都张贴了安全警示标识,一名具有资质的电工负责厂内的电气安全,电气设施每月检查一次。特种设备(一台电梯)的年检报告有提供,并且工厂有资质的操作工。干净的饮用水被提供在车间。工厂有2名具有资质的急救员,配备足够药品的急救药箱提供在生产场所。并且工厂和北大瓯医医院签订了紧急医疗服务协议。工厂没有提供餐厅、宿舍和交通给员工。所以,7.21,7.23和7.24不适用。然而,工厂在实施中仍存在差距。</p> <p>7.1 - 1. Through site observation and management interview, the occupational hazard factors of noise and dust existed in the material crushing and mixing workshop. However, no pre-job and on-job occupational health examination was provided to these workers. Moreover, no post-job or job-transfer occupational health examination was provided to workers that were previously working in these positions. Per management interview and provided documents, no workers transferred jobs, but 15 workers resigned. (Reference law: PRC Law of Prevention and Control of Occupational Diseases article 35.) 2. Through site observation and management interview, the occupational hazard factors of noise and dust existed in the material crushing and mixing workshop. However, the factory could not provide evaluation report of occupational hazard factors for review. (Reference law: Provisions on the Supervision and Administration of Workplace Occupational Health Article 20)                      1.根据现场观察和管理人员访谈,碎料和拌料车间存在噪声和粉尘职业病危害因素。但是工厂没有为这些员工提供岗前和在岗职业病体检。也没有为之前在这些岗位工作的员工提供离职和转岗职业病体检。根据管理人员访谈和所提供的文件,过去12个月没有员工转岗,但是有15名员工离职。(参考法律法规:《中华人民共和国职业病防治法》第35条) 2.根据现场观察和管理人员访谈,碎料和拌料车间存在噪声和粉尘职业病危害因素。但是工厂未能提供该作业场所的职业危害因素监测报告供审阅。(参考法律法规:《工作场所职业卫生监督管理规定》第二十条)</p> <p>7.3 - The risk assessment carried out by the facility was incomplete, special group like the old, the disabled and migrant workers were not taken into account.                      工厂的风险评估不完整,没有考虑到老年员工、退休员工和外地员工等特殊群体。</p> <p>7.9 - Per site observation, no heat warning sign was posted near the drinking water. (Reference law: Guidelines for Use of Safety Signs, Article 4.2.3, No.2-18)                      根据现场观察,饮用水旁边没有张贴高温警示标识。(参考法律法规:《安全标志使用导则》第4.2.3条,编号2-18)</p> <p>7.22 - One restroom on the 2nd floor of the production building was not installed with privacy door, moreover, no cleaning supplies like soap was provided.                      生产区域二楼的一个洗手间没有安装隐私门,也没有提供肥皂等清洁用品。</p>	
<b>Remarks from Auditee:</b> Accept	
<b>Performance Area 8 : No Child Labour</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility had established hiring procedure regarding prohibition use of child labor, meanwhile, the facility had also established remediation procedure on child labor in order to set up measures for recruiting child labor incidentally. The facility checked workers' ID during recruiting, per interview with HR specialist, HR specialist knew the skills of asking workers' experience and ages when there was doubt of workers' ID card or age. The youngest employee in the factory was 21 years old, no child labor was hired by the factory.</p> <p>工厂建立了禁止使用童工的招聘制度,同时工厂还制定了童工补救措施以建立意外招聘童工的应对措施。招聘时工厂均会查看员工的身份证,通过与人事专员访谈发现,人事专员了解当对员工身份证或年龄有怀疑时询问员工经历与年龄的技巧。工厂最小的员工21岁,未招聘童工。</p>	
<b>Remarks from Auditee:</b>	

<b>Performance Area 9 : Special protection for young workers</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The factory had established a written policy concerning protection of juvenile employees such as no overtime work, night shift work or harmful position work (material crushing & mixing and injection) would be arranged for juvenile employees, and juvenile employees would be provided with free health check for free. Through document review, factory tour and employee interview, no juvenile employee was used in the factory. The youngest employee in the factory was 21 years old. Thus, 9.6 was rated as N/A. 工厂建立了未成年工保护政策, 比如不能安排未成年工加班、上夜班或在有毒有害岗位(碎料、拌料和注塑)工作, 并且给未成年工提供免费体检。通过文件审核、现场走访和员工访谈, 工厂没有使用未成年工。工厂最小的员工是21岁。所以, 9.6不适用。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 10 : No Precarious Employment</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> The facility had established recruitment policies, which included the content like recruitment process, remuneration, hours of work, disciplinary measure, promotion, training, termination of employment etc. The facility signed labor contracts with all employees on the day of on boarding and provided a copy version to them. The labor contracts were in local language (Chinese) and all employees could understand it. Items like working position, working hours, remuneration method and basic wage, social insurance etc. were included in the labor contracts. All the employees were directly hired by the facility, no dispatched worker, student worker and apprentice were hired. 工厂制定了招聘政策, 招聘政策包括招聘流程、报酬、工作时间、纪律措施、晋升、培训、离职等内容。工厂在员工入职当天订立劳动合同并且给员工提供了员工合同副本。劳动合同是当地语言(中文)的, 所有员工都能看懂。合同里包含了工作岗位, 工作时间, 计薪方式及基本工资, 社会保险等条款。所有员工都是工厂直接聘用的, 工厂没有用到劳务派遣工, 学生工, 学徒工等。	
<b>Remarks from Auditee:</b>	
<b>Performance Area 11 : No Bonded Labour</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> Based on site tour, document review and interview, the facility didn't limit employees' freedom, including resignation or ask for leave. The inhumane or degrading treatment, corporal punishment, mental or physical coercion and verbal abuse never occurred in the facility. There was no prison labour or forced labour. No ID card or wage was withheld by the facility. Workers were working without pressure. Disciplinary measures were all reasonable, including verbal warning, warning letter and termination. 基于现场走访, 文件评估和访谈, 工厂没有限制员工的自由, 包括离职或请假。工厂从未出现不人道或有辱人格的待遇、体罚、精神或肉体胁迫和辱骂。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。员工在工厂上班没有压力。处罚措施是合理的, 包括口头警告, 警告信和解雇。	
<b>Remarks from Auditee:</b>	

<b>Performance Area 12 : Protection of the Environment</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: A	Deadline date:28/02/2019
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <p>The facility established policy and procedure to protect environment. The main products manufactured by the factory were paint tray. The facility did not generate industrial wastewater, only domestic wastewater was discharged. Noise and small amount of waste gas was generated from the process of injection workshop. Only few amount of machine oil was used in facility, no hazardous waste was generated. Per site observation, document review and management interview, no waste discharge permit was needed in the facility; therefore, 12.3 was N/A. However, some gap was detected in the audit.</p> <p>企业建立了环境保护的政策和程序。工厂主要生产产品是油漆工具，工厂不产生生产废水，只排放生活废水。注塑工序有噪声和少量废气产生。工厂只使用到了少量机油，未产生危险废弃物。根据现场观察，文件查阅和管理人员访谈，工厂不需要排污许可证，因此12.3不适用。然而，工厂在实施中仍存在差距。</p> <p><b>12.1 -</b> The facility had not obtained environmental impact assessment report and environmental impact assessment approval for construction project. (Reference law: PRC Environmental Impact Assessment Law article 16 and article 22) 工厂没有获得建设项目环境影响评价报告和建设项目环境影响审查批复。(参考法律法规:《中华人民共和国环境影响评价法》第16条和22条)</p>	
<b>Remarks from Auditee:</b> Accept	
<b>Performance Area 13 : Ethical Business Behaviour</b>	
Full Audit [Audit Id - 132321] Audit Date: 29/08/2018 PA Score: B	Deadline date:28/02/2019
<b>GOOD PRACTICES:</b> None	
<b>AREAS OF IMPROVEMENT:</b> <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. In addition, the factory had informed their suppliers of this requirement and all the suppliers had signed statements of complying with this policy. The factory provided correct data and information during this audit. The factory also established grievance mechanism for workers to report unethical behaves, and proper investigation and disciplinary action would follow. The factory had established relevant procedure to collect, uses and processes personal information with reasonable care and in accordance with privacy and information security laws and regulatory requirements.</p> <p>企业已建立反贿赂、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。此外，企业已与其供应商沟通此要求，供应商已签署廉政声明以符合该制度要求。本次审核，企业提供了准确的记录和信息。企业也建立了适当的投诉机制以便工人举报不道德的行为，并会随之就不道德的行为进行调查和采取处罚措施。且企业已经建立相关的程序以确保按照隐私和信息安全法和监控要求收集、使用和进行合理谨慎的处理个人隐私信息。</p> <p><b>13.2 -</b> The facility did not apply for updating the business license after its' operating site being expanded. Per provided business license, the facility was located at 1F-2F of Building 5-1, No.98, Longtanshan Road, Daqi Town, Beilun District, Ningbo, Zhejiang, China, however, currently the 3rd floor was also used by the facility. But the facility had not applied for undating the address information in the business license. The facility management explained that the 3rd floor was rent from the landlord since March 2017 due to increasing production scale. (Reference law: Regulations of PRC for controlling the registration of enterprises as legal persons Article 17) 工厂没有在经营地址扩大后申请更新营业执照，根据所提供的营业执照，工厂位于中国浙江省宁波市北仑区大碶龙潭山路98号5幢1号1至2层。但是当前该栋楼的3楼也由工厂使用，但是工厂没有申请更新营业执照上的地址信息。工厂管理人员表示由于生产规模扩大，从2017年3月起向房东租赁了3楼。(参考法律法规:《中华人民共和国企业法人登记管理条例》第十七条)</p> <p><b>13.4 -</b> Policy and procedure regarding personal privacy protection and information security had been established in the facility, but related training was not provided to employees. 工厂建立了有关个人信息隐私保护和信息安全的政策程序，但是没有给员工提供相关的培训。</p>	
<b>Remarks from Auditee:</b> Accept	

**Summary**



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	29/08/2018	132321	D	A	A	A	B	D	A	A	A	A	A	A	B	C

Producer Photos



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



Photo of the inside of the main production hall  
Explosion-proof light.JPG



Photo of fire safety equipment  
Directional evacuation sign.JPG



External photo(s) of the production unit(s)  
Facility outlook.JPG



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



Photo of fire safety equipment  
Emergency light and directional sign in the staircase.JPG



Photo first aid facilities  
First aid kit.JPG



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



Photo of fire safety equipment  
Emergency light testing.JPG



Photo of non-conformity  
NC-13.2 Business license not updated after plant  
expanded.JPG



Photo of the inside of the main production hall  
Material crushing and mixing workshop.JPG



Photo of fire safety equipment  
Evacuation plot plan.JPG



Photo of non-conformity  
NC-2.5 Suggestion box installed in improper position.JPG



Photo of the inside of the main production hall  
No smoking sign.JPG



Photo of fire safety equipment  
Exit sign and emergency light.JPG





Photo of non-conformity  
NC-7.22 Hand-wash station without cleaning supply.JPG



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



Photo of fire safety equipment  
Fire alarm device.JPG



Photo of non-conformity  
NC-7.22 Restroom without privacy door.JPG



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



Photo of fire safety equipment  
Fire alarm testing.JPG



Photo of non-conformity  
NC-7.3 Incomplete risk assessment.JPG



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



Photo of fire safety equipment  
Fire equipment internal inspection records.JPG



Photo of non-conformity  
NC-7.9 Drinking water water without heat warning.JPG



Photo of the personal protection equipments (if applicable)  
Ear-plugs mask and goggles used by material crushing and mixing worker.JPG



Photo of fire safety equipment  
Fire equipment.JPG



Photo of the code of conduct on display  
amfori BSCI COC and TOI.JPG



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



Photo of fire safety equipment  
Fire hydrant testing.JPG



