

Sedex Members Ethical Trade Audit Report

Version 7



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Audit content

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

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

Included in a 2-Pillar audit:

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

Included in a 4-Pillar audit:

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

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

Audit and site details

Audit details

Sedex company reference	ZC5000046642	Auditor company name	Benchmarks Company Limited
Date of audit	2024-12-13	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and safety		

Site details

Sedex site reference	ZS1000054929	Site name	Nantong Sonice Safety Products Co Ltd
Business name	Nantong Sonice Safety Products Co Ltd	Site address	226000 Shuangyi Venture Park 6#102 Workshop, No.118, Huanghe Road, Rudong Economic Development Zone, Rudong County, Nantong City, Jiangsu Province, China, nantog, CN
Site phone	13905126561	Site email	nantongsuonasi@163.com

Audit parameters

Time in and out	Day 1	
	In	08:30
	Out	16:30
Audit type	Full initial	
Was the audit announced?	Semi announced	
Was the Sedex SAQ available for review?	Yes	
Who signed and agreed CAPR?	Wang Feng / Manager	
Any conflicting information SAQ/Pre-Audit Info	No	
Is further information available?	No	

Audit attendance

	Senior management	Worker representative	Union representative
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
Reason for absence at the opening meeting	There was no union at this factory.		
Reason for absence during the audit	There was no union at this factory.		
Reason for absence at the closing meeting	There was no union at this factory.		

SMETA declaration

Auditor team

SMETA declaration	I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual. - Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform. - Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question. This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.		
Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)	Nil		
Lead auditor	Billy Han	APSCA Number	21703587
Additional auditor			
Date of declaration	2024-12-13		

Site representation

Declaration	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
Full name	Wang Feng
Title	Manager
Date of declaration	2024-12-13

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	§1	NC ZAF600745364
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§2	NC ZAF600745365
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§3	NC ZAF600745366

Local law issues

§1	In accordance with the PRC Law of Prevention and Control of Occupational Diseases Article 35, the employer shall conduct regular occupational health examination for those labourers who are engaged in works with occupational hazard(s) as required by the public health administrative department under the State Council. The occupational health examination shall be conducted before labourers start to take the post, in the course of the work and after leave the post and the employer shall provide the results of the occupational health examinations to labourers in written. The expenses of the occupational health examination shall be borne by employers. The employer shall not arrange labourers to engage in the work with occupational hazard(s) prior to the pre-post occupational health examination, or labourers with any occupational prohibition to engage in the prohibited work from them. Once the occupational health examination indicates that employee is suffering from the occupational damage in relation to his or her occupation, the employer shall transfer such a labourer out of his or her original post, and allocate him or her in a proper way. The employer shall not rescind or terminate the labour contracts signed with those employees without the occupational health examination at time of leaving the post. The occupational health examination shall be undertaken by the Medical and Health Institutions with Practicing Licence of Medical Institution. The Health Administrative Department shall strengthen the standardization management of occupational health examination. The specific administrative measures shall be formulated by the Health Administrative Department of State Council.
§2	In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.
§3	In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

Management systems

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



Not addressed



Fundamental improvements required



Some improvements recommended



Robust management systems

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

- ✖

Not addressed
- ⚠

Fundamental improvements required
- ℹ

Some improvements recommended
- ✔

Robust management systems

Site details

Company and site details

Sedex company reference	ZC5000046642	
Sedex site reference	ZS1000054929	
Company name	Nantong Sonice Safety Products Co Ltd	
Business ownership type	GOODS	
Site name	Nantong Sonice Safety Products Co Ltd	
Site name in local language	南通索娜斯安全用品有限公司	
GPS location	GPS address	Shuangyi Venture Park 6#102 Workshop, No.118, Huanghe Road, Rudong Economic Development Zone, Rudong County, Nantong City, Jiangsu Province, China.
	Coordinates	Latitude: N32°21'17", Longitude: E121°9'45"
Is the worksite in a remote location, far from habitation?	No	
Site contact	Contact name	Ma Weixing
	Job title	General Manager
	Phone number	13905126561
	Email	Roland@soniceindustry.com
Applicable business and other legally required business license numbers and documents	91320623MAD5G3M948	

Site activities

Site function	Factory Processing/Manufacturer
---------------	---------------------------------

Site activities

Site activities	Primary	Manufacture of knitted and crocheted apparel
	Secondary	
	Other	
Product type	Protective gloves	
Process overview	Knitting, Look over and check, Overlocking, Inspection and Packing	
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour	

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	1200m ²	
Building 1	Last construction works on site	2019
	If building is shared, provide details	The audited factory was located on the first and second floors of the building. The third, fourth and fifth floors of the building were used by other factories.
	Number of floors	5
	Description of floor activities	Knitting, Look over and check, Overlocking, Inspection and Packing, Office, warehouse
Is there any difference between the site scope of the audit and the Sedex site profile?	No	
Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?	No	
Is any activity conducted onsite not included within the scope of the audit?	No	

Worker accommodation and transport

Are there any site-provided worker accommodation buildings?	No
Does the site organise worker transport to the worksite?	Not applicable Provide transport was not required by local law.

Work patterns

Approximate workers on site per month (% of peak)	January	75-90%	February	75-90%
	March	75-90%	April	90-95%
	May	90-95%	June	90-95%
	July	90-95%	August	90-95%
	September	90-95%	October	95-100%
	November	95-100%	December	95-100%
Is there any night or back shift work at the site?	No			

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	No
Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community?	Yes Based on document review, it was acceptable.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	Yes The factory conducted human right impact assessment every year.

Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	2 (28.6%)	5 (71.4%)	- -	7 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	2 (28.6%)	5 (71.4%)	- -	7 (100%)
Temporary or fixed term employees	0 (0%)	0 (0%)	- -	0 (0%)
Agency or subcontracted workers	0 (0%)	0 (0%)	- -	0 (0%)
Seasonal workers	0 (0%)	0 (0%)	- -	0 (0%)
Self-employed workers	0 (0%)	0 (0%)	- -	0 (0%)
Informal workers including home workers	0 (0%)	0 (0%)	- -	0 (0%)
Apprentices, trainees or interns	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
International migrant workers	0 (0%)	0 (0%)	- -	0 (0%)
Total migrant workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

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

N/A

Workers by age

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

* % of total workforce

Is the worker analysis data relevant for peak season and current to the audit?

Yes

Please list the nationalities of all workers, with the three most common nationalities listed first

Chinese

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	29%	71%	-	100%

Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 (0%)	0 (0%)	- -	0 (0%)
Workers paid hourly / daily rate	2 (28.6%)	5 (71.4%)	- -	7 (100%)
Salaried workers	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 (0%)	0 (0%)	- -	0 (0%)
Paid weekly	0 (0%)	0 (0%)	- -	0 (0%)
Paid monthly	2 (28.6%)	5 (71.4%)	- -	7 (100%)
Other	0 (0%)	0 (0%)	- -	0 (0%)

* % of total workforce

If other payment cycle entered, please provide details Nil

People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	0 (0%)	0 (0%)	- -	0
Supervisors or team leaders	1 (14.3%)	0 (0%)	- -	1
Administrative staff	1 (14.3%)	1 (14.3%)	- -	2

Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement were used? Individual interviews
Group interviews

Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers? Yes

Was the interview sample representative of the gender composition of the workforce? Yes

Number and size of group interviews 1 group of 2 workers

Did workers understand the purpose of the audit? Yes

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

Was there any indication that workers had been 'coached' in how they should respond to questions? No

What was the general attitude of the workers towards their workplace? Favorable

Attitude of workers

In which areas did workers raise significant concerns or complaints?	Overtime
What did the workers like the most about working at this site?	Pay
Additional comments	7 employees were selected for the interview. All the interviewees were favourable with the management and working condition, and no negative information was raised.
Attitude of workers' committee/union representatives	The worker representative was favourable with the management and working condition, and no negative information was raised.
Attitude of managers	The factory management was found to be cooperative throughout the audit.

Workers interviewed by type

	Total
Permanent workers	7
Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
Total number of workers interviewed	7

Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	1	1	-	2
Workers interviewed individually	1	4	-	5

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	0	0	-	0

Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	2.0%	-	4.0%
Last full calendar year (2023)	3.0%	3.0%	-	6.0%
Previous full calendar year (2022)	2.0%	1.0%	-	3.0%

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

Rate of absenteeism (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	2.0%	-	4.0%
Last full calendar year (2023)	1.0%	2.0%	-	3.0%
Previous full calendar year (2022)	1.0%	1.0%	-	2.0%

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

Are accidents recorded?

Yes

Management kept records of all accidents. No accident happened in the factory.

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

	Men	Women	Other	Total

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

Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

* Calculated as (number of work related accidents and injuries * 100) / number of total workers.

Lost day work cases (per 100 workers)*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

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

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

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

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

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

Last full calendar year (2023)	0.0%	0.0%	-	0.0%
Previous full calendar year (2022)	0.0%	0.0%	-	0.0%

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding
No findings			
Systems and evidence examined to validate this code section	Current Systems: 1. The facility published a human rights statement and posted in public. 2. Mr. Wang / Manager was responsible for implementing standards concerning Human Rights. 3. There was formal training given to all employees and their suppliers on the need to protect human rights. 4. The facility had a transparent system in place for confidentially reporting and dealing with human rights impacts without fear of reprisals towards the reporter. Evidence examined: 1. Employee handbook with ETI Code, written policies and procedure. 2. Social responsibility management manual contained details of Code and Business Ethics with the commitment of being compliant in all aspects of business and integrity aligned with the client requirement and local law. 3. Management interview and worker interview.		

0. Enabling accurate assessment

Data points

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

1. Employment is freely chosen

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: The company prohibited forced labor policy outlining the systems in place to manage this issue at the site. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: The manager received relevant social responsibility training, which included content on the prohibition of forced labor. They used this knowledge to develop effective procedural documents and to conduct training for factory workers. However, some employees could not understand the specific requirement. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. But the record of the monitoring was incomplete.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

- Current Systems:
1. The factory had a policy which prohibited forced labour and this was available for review.
 2. There was a non-formalised application procedure which stated that workers must present their IDs for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
 3. The employee handbook - given to all workers on joining, stated that workers within their probation period were free to leave with 3 days written notice and once a worker was permanent (this was out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also stated that they would be given their full wages on their last day of work.
 4. The terms and conditions of employment in the handbook stated that the workers were free to leave the workplace outside of their working hours.
 5. Contract for security guards stated that they must not prevent workers from leaving the premises outside of working hours and where they were conducting searches that this was at the request of management, was done on a sample basis and was performed discretely and without significant delay to workers leaving at the end of shift.
 6. The above was confirmed in management and worker interview.
- Evidence examined:
1. Social accountability policy and manual
 2. Personnel files and labour contracts
 3. Resignation records
 4. Interview with management and workers
 5. Site tour

1. Employment is freely chosen

Data points

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

1.A. Responsible recruitment and entitlement to work

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: The company recruitment procedure outlining the systems in place to manage this issue at the site. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: The manager received relevant social responsibility training, including recruitment related content such as identity verification, no deposits, no fees, etc. They used this knowledge to develop effective procedural documents and to conduct training for factory workers. However, no test after the training, partial employees didn't know the requirements. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Adherence to the processes was monitored through departmental reporting to the Manager, and there was a mechanism to monitor whether the procedures were implemented by workers, the manager strictly followed and monitored the execution of the procedure, and there were no cases where employees were required to pay additional fees. But the monitoring records were incomplete, partial months did not record.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

- Current Systems:
1. The factory had a policy which prohibited forced labour and this was available for review.
 2. There was a non-formalised application procedure which stated that workers must present their IDs for proof of age but that only copies must be kept in the personnel files and the original given back to the workers.
 3. The employee handbook - given to all workers on joining, stated that workers within their probation period were free to leave with 3 days written notice and once a worker was permanent (this was out of probation) they can resign from the factory with one month's prior written notice, given to their supervisor or the personnel office. The handbook also stated that they would be given their full wages on their last day of work.
 4. The terms and conditions of employment in the handbook stated that the workers were free to leave the workplace outside of their working hours.
 5. Contract for security guards stated that they must not prevent workers from leaving the premises outside of working hours and where they were conducting searches that this was at the request of management, was done on a sample basis and was performed discretely and without significant delay to workers leaving at the end of shift.
 6. The above was confirmed in management and worker interview.
 7. Include provisions within service agreements that hold labour providers or on-site subcontractors contractually responsible to ensure no recruitment fees or related costs are incurred or charged to workers and specifies the responsible party for reimbursing workers accordingly if they incur fees or costs. The workers did not pay recruitment fees or related costs.
- Evidence examined:
1. Social accountability policy and manual
 2. Personnel files and labour contracts
 3. Resignation records
 4. Interview with management and workers
 5. Site tour

1.A. Responsible recruitment and entitlement to work

Data points

Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (including dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

Migrant workers

Do any workers migrate across international borders to work at this site?	No
Percentage of workers that are migrant	0%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	No

Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No
Nil

2. Freedom of association and right to collective bargaining are respected

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: Sites had provided evidence that they have developed policies and procedures about freedom of association and right to ensure ongoing compliance with all the Workplace Requirements within the Base Code Area. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: All employees were provided with the training. However, partial employees said they had rest on the training day, the training was incomplete. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Site had provided evidence that they effectively monitor the implementation of procedures put in place to ensure ongoing compliance. But the monitoring records was incomplete, only showed the internal audit score, no specific details.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:

1. The factory management always respected workers' choice and the freedom of association and never interfered with workers to join the trade union or any other kind of workers committee.
2. There was no union in the factory.
3. The worker committee was made up of 2 workers' representatives who were democratically elected by the production workers. The worker representatives normally would have a meeting on a trimonthly basis to summarize the concerns and complaints from production workers.
4. All interviewed workers stated that they could report their concerns to the worker representative or directly to the supervisor or upper management.
5. In addition, workers could also response their concerns through suggestion box. And all complaints or suggestions would be tackled within a short time.

Evidence examined:

1. The policy on freedom of association and right to collective bargaining.
2. Social accountability manual included worker committee selection program and the responsibility of the worker representative.
3. Interview with workers
4. Interview with management

2. Freedom of association and right to collective bargaining are respected

Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

3. Working conditions are safe and hygienic

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: The company health and safety policy outlining the systems in place to manage this issue at the site. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Sites had provided evidence that policies and procedures have been effectively communicated to all stakeholders relevant to ensuring ongoing compliance. However, partial employees did not understand the standard. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring in place for the Base Code Area in general but some requirements are overlooked such that there is potential for minor NCs to arise over time.

Summary of findings

Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.A Ensure a safe working environment. Put in...	§1	NC ZAF600745364

Systems and evidence examined to validate this code section

Current Systems:

1. General Health and Safety management
 - Health & Safety policy was established in the factory and the factory manager was familiar with it.
 - Mr. Wang / Manager was appointed to be responsible for the facility's safety and health conditions.
 - Purified water was provided free of charge to workers, the drinking water test report was up-to-date and kept in the factory and the test result was qualified.
 - Minutes of meetings showed that there were trimonthly meetings between the H&S committee (workers) and the H&S manager, and each point was acted on.
2. Fire Safety
 - There were at least 2 exits from each work area.
 - Firefighting equipment were adequate and checks were up-to-date.
 - Fire drills were organised and recorded every 6 months for production unit, the latest fire drill was conducted on Aug. 20, 2024.
 - Training had been given to all employees.
3. Electrical safety
 - There was 1 competent electrician at the site and his training certificate was available for review.
4. Medical services
 - There were adequate first aid kits in each production area and they were well stocked.
 - There are 2 trained first aiders on site.

Evidence examined:

1. Health and safety policy
2. Health and safety manual
3. Health and safety committee minutes
4. Training records and certificates
5. Government licenses
6. Special equipment inspection reports and qualified operator certificates
7. Fire equipment maintenance records
8. Fire drill and evacuation records
9. Building structure safety certificates
10. Fire safety certificates
11. First aider certificates
12. Checks on fire equipment
13. Accident reports
14. Electrician certificates
15. Potable water testing report
16. Interview with H&S manager and committee members
17. Interview with workers
18. Site tour

Findings: non-compliances

ZAF600745364

Non-compliance

Due 2025-01-22

Code area

3 Working conditions are safe and hygienic

Status

Open*

Workplace requirement

3.A Ensure a safe working environment. Put in place adequate controls to prevent accidents and injury (including long-term injury) to health arising out of, associated with, or occurring in the course of work.

Time given to resolve

30 days

Issue title

317 - No medical examinations or regular occupational health checks, including disease checks, of workers in hazardous situations (e.g. exposed to noise or dust) or working with hazardous substances (e.g. chemicals and pesticides)

Verification method

Desktop audit

Area of non-compliance/non-conformance

Local law

Base code

Description

Based on document review, the factory did not conduct regular physical examinations for employees who were exposed to occupational hazards.

根据文件审核，工厂没有为接触到职业危害的员工进行职业安全体检。

Corrective and preventative actions

It is recommended that the facility should provide occupational health examination to the relevant employees who work with occupational hazards according to legal requirements. 建议企业按照相关的法规要求为从事职业病危害作业的员工提供职业病体检。

Local law reference

In accordance with the PRC Law of Prevention and Control of Occupational Diseases Article 35, the employer shall conduct regular occupational health examination for those labourers who are engaged in works with occupational hazard(s) as required by the public health administrative department under the State Council. The occupational health examination shall be conducted before labourers start to take the post, in the course of the work and after leave the post and the employer shall provide the results of the occupational health examinations to labourers in written. The expenses of the occupational health examination shall be borne by employers. The employer shall not arrange labourers to engage in the work with occupational hazard(s) prior to the pre-post occupational health examination, or labourers with any occupational prohibition to engage in the prohibited work from them. Once the occupational health examination indicates that employee is suffering from the occupational damage in relation to his or her occupation, the employer shall transfer such a labourer out of his or her original post, and allocate him or her in a proper way. The employer shall not rescind or terminate the labour contracts signed with those employees without the occupational health examination at time of leaving the post. The occupational health examination shall be undertaken by the Medical and Health Institutions with Practising Licence of Medical Institution. The Health Administrative Department shall strengthen the standardization management of occupational health examination. The specific administrative measures shall be formulated by the Health Administrative Department of State Council.

* PDF generated at 02:53 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

3. Working conditions are safe and hygienic

Data points

Is someone within the company responsible for health and safety?	Yes, qualified safety officer
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Not applicable
Who organises worker transportation between accommodation and worksite?	Not applicable
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable The factory no added floors.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No
Does the site have a structural engineer evaluation?	Yes

4. Child labour shall not be used

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1. Policies and Procedures: The company child labour policy and Procedure outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2. Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3. Communication and Training: The manager received relevant social responsibility training, including Prohibit child labor and protect juvenile workers, they used this knowledge to develop effective procedural documents and to conduct training for factory workers. 4. Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Sites had provided evidence that policies and procedures have been effectively communicated to all stakeholders relevant to ensuring ongoing compliance. Sites had provided evidence that they effectively monitor the implementation of procedures put in place to ensure ongoing compliance.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:

1. There was a written policy in regard to prohibition of child labour, which stipulated that no worker under 16 years old would be recruited in the factory.
2. To prevent hiring child labour, the factory also established age verification mechanism. The HR staffs would authenticate ID card of candidates via physical appearance comparison, questions testing and ID card authentication facility. All these processes ensured no fake ID card was used by potential worker during the hiring process.
3. According to review of employees' personal files and employee interview, there was no child labour in the factory.
4. Through reviewing employees' personnel files and whole factory tour, there was no employee that was under 18 years.

Evidence examined:

1. The recruitment policy on child labour was reviewed. It stated that the factory would never employ or use any child labour under the age of 16 years old.
2. Recruitment procedure
3. Latest employee list
4. Personnel files of all workers
5. Interview with management and workers
6. Site tour

4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	38
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

5. Legal wages are paid

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: Sites had provided evidence that they have developed policies and procedures about wages and benefits to ensure ongoing compliance with all the Workplace Requirements within the Base Code Area. The policy was updated in 2024. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Sites had provided evidence that policies and procedures have been effectively communicated to all stakeholders relevant to ensuring ongoing compliance. However, partial employees did not understand the standard. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Site had provided evidence that they effectively monitor the implementation of procedures put in place to ensure ongoing compliance. But the monitoring records was incomplete.

Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	§1	NC ZAF600745365

Systems and evidence examined to validate this code section

Current Systems:

1. All employees' wages were calculated by hourly rate basis by cash on or before 20th of each month for the last month.
2. During this audit, the payroll records from Nov. 2023 to Oct. 2024 (current month) and attendance records from Nov. 1, 2023 to the audit day were provided for review. As per review of 7 sampled employees' payrolls and attendance records from Jan. 2024(random month), May 2024(random month) and Oct. 2024 (current month).
3. According to payroll records, legal minimum wage was ensured – legal minimum wage was RMB 2260 per month (RMB12.99 per hour) effective from Jan. 1, 2024.
4. The minimum wage paid by the factory was RMB 3100 per month (RMB 17.82 per hour) for permanent workers according to the wage records.
5. The payroll office was well organised with a good, controlled set of processes which were understood by all employees.
6. All workers were provided with written and understandable information about their employment conditions in respect to wages before they entered employment and about the particulars of their wages for the pay period concerned each time that they were paid.
7. Benefits of paid, annual leave was given to all workers and child-bearing leave to appropriate workers.
8. Not all employees were provided with social insurances.

Evidence examined:

1. Wages and benefits policy and procedure
2. Local and national laws
3. Local legal min wage documents
4. Overtime premiums records
5. Labour contracts for all workers
6. Resignation records
7. Production records
8. Social security insurance payment receipts
9. Worker interview and management interview

Findings: non-compliances

ZAF600745365	Non-compliance	Due 2025-02-21
Code area 5 Legal wages are paid	Status Open*	
Workplace requirement 5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.	Time given to resolve 60 days	
Issue title 423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	Verification method Follow up audit	
Description The factory did not pay social insurances for all employees. Based on document review, the factory had a total of 8 employees, no retired worker and no new worker during the audit. All 8 employees had not participated in social insurance in the past one year. The factory paid commercial accident insurance for all workers. 工厂没有为所有员工缴纳社会保险。根据文件审核，审核期间工厂共有员工8名，无退休员工，无新进员工。在过去一年内所有的8名员工都没有参加社会保险。工厂为所有员工缴纳商业意外保险。	Area of non-compliance/non-conformance Local law Base code	
Corrective and preventative actions It is recommended that the factory should provide social insurance to employees as per local social insurance administrative department requirement, and the records should be kept. 建议工厂应为所有员工提供社会保险并保留缴费证明。		
Local law reference In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.		
Evidence		

5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Other (provide details) Wages are based on working hour.
Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers?	Does not use digital payments (give details) By cash.
How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits?	None

Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers?	Not applicable
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Summary information

Is legal wage/legally recognised CBAs data available for any of these options?	Monthly	
Is actual wage data available on site for any of these options?	Monthly	
Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	184.0

Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	2.0
	Max hours per week	16.0
	Max hours per month	64.0
Minimum legal wage	Min per hour	12.99
	Min per day	103.91
	Min per week	519.54
	Min per month	2260.0
Actual minimum wage	Actual per hour	17.82
	Actual per day	142.53
	Actual per week	712.64
	Actual per month	3100.0
Minimum legal overtime wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	26.72
	Actual per day	53.45
	Actual per week	644.0
	Actual per month	2576.0

Wage analysis

Number of workers' records checked	7
Provide the date and details of the records	7 samples from Jan. 2024 (Random month), 7 samples from May 2024 (Random month), 7 samples from Oct. 2024 (Current month)

Are there different legal minimum/ legally recognised CBAs wage grades?

No

For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/ legally recognised CBAs?

Above legal minimum

Indicate the breakdown of workforce per earnings

0.0% of workforce earning under minimum wage
0.0% of workforce earning minimum wage
100.0% of workforce earning above minimum wage

Are there any bonus schemes used?

No

Were accurate records shown at the first request?

Yes

Were any inconsistencies found?

No

5.A. Living wages are paid

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		
Systems and evidence examined to validate this code section	Current Systems: 1. According to the local expenses of education, transportation, food, clothing, energy consumption, etc., the factory calculated the living wages was RMB 2,552. The factory pays its employees a minimum wage was RMB3,100. Evidence examined: 1. Wages and benefits policy and procedure 2. Local and national laws 3. Local legal min wage documents 4. Overtime premiums records 5. Worker interview and management interview		

6. Working hours are not excessive

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: Sites had provided evidence that they have developed policies and procedures about working hours to ensure ongoing compliance with all the Workplace Requirements within the Base Code Area. And the policy was provided to the employees by employees handbook. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Sites had provided evidence that a management structure clearly assigns all necessary responsibilities for ensuring the workplace requirements are met. However, there are no clear appointments, and the employees are unclear. 4.Monitoring: Major gaps in monitoring of procedures that does not ensure sufficient management of Workplace Requirements on an ongoing basis.

Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is...	§1	NC ZAF600745366

Systems and evidence examined to validate this code section

Current Systems:

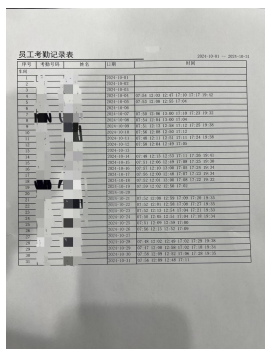
1. According to workers interview and time records, the working hours 8:00-12:00, 13:00 -17:00.
2. Working hours was recorded by fingerprint recognition system, the factory provided attendance records from Nov. 1, 2023 to the audit day.
3. Based on the working time records, all employees had one day off in every 7 days.
4. Based on the working time records, the most weekly working hours were 56 hours.
5. Wages were calculated on monthly rate and paid on or before 20th by cash of each month.

Evidence examined:

- 1.Factory policy on working hours
- 2.Local and national laws
- 3.Workers contracts
- 4.Attendance records
- 5.Production and quality records to cross check hours
- 6.Management interview and worker interview

Findings: non-compliances

ZAF600745366		Non-compliance	Due 2025-02-21
Code area 6 Working hours are not excessive		Status Open*	
Workplace requirement 6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.		Time given to resolve 60 days	
Issue title 480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)		Verification method Follow up audit	
Description Overtime hours exceeded the legal requirement. According to the factory's attendance record from Nov. 1, 2023 to the day of the audit, auditor found that the monthly overtime hours of 8 out of 10 randomly selected employees ranged from 10 to 64 hours in Oct. 2024 (Most current month); monthly overtime hours of 8 out of 10 ranged from 10 to 64 in May 2024 (Random month); monthly overtime hours of 8 out of 10 ranged from 10 to 50 in Jan. 2024. 加班时间超过法规要求。根据工厂提供的2023年11月1号到审核当天的考勤记录，审核员发现在抽取的2024年10月份（当前月）的考勤中，10名随机抽取的员工中有8人的月加班时间为10-64小时；2024年5月份（随机月）的考勤中，10名随机抽取的员工中8人的月加班时间为10-64小时；2024年1月份（随机月）的考勤中，10名随机抽取的员工中8人的月加班时间为10-50小时。		Area of non-compliance/non-conformance Local law Base code	
Corrective and preventative actions It is recommended that the facility should reduce the overtime hours to ensure it is within 3 hours per day and 36 hours per month.建议企业应减少员工的加班时间确保每天的加班时间不超过3小时，每月的加班时间不超过36小时。			
Local law reference In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.			
Evidence			



[Attendance record.jpg](#)



* PDF generated at 02:53 (UTC) on 23 Dec 2024. [View this finding on the Sedex platform](#) for live updates and closure details.

6. Working hours are not excessive

Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	56.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	56.0
Maximum number of days worked without a day off in sample	6

7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Policies and Procedures: Sites had provided evidence that they have developed policies and procedures about refuse discrimination to ensure ongoing compliance with all the Workplace Requirements within the Base Code Area. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Sites had provided evidence that policies and procedures have been effectively communicated to all stakeholders relevant to ensuring ongoing compliance. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Sites had provided evidence that they effectively monitor the implementation of procedures put in place to ensure ongoing compliance.

Summary of findings

Code area	Workplace requirement	Local law	Finding
	No findings		

Systems and evidence examined to validate this code section

Current Systems:

1. As informed by interviewed employees, most employees spoke highly of the facility owner.
2. No employee was required to do the examination of the hepatitis B virus and HIV. Female workers in this factory were not required to take pregnant tests before or during their employment.
3. Anti-discrimination procedure on hiring, compensation, promotion and access to training was available during the audit, Gender divisions did not exist in the facility; both female and male employees were distributed in all types of work.
4. There was an internal grievance process, all sampled employees were aware of the grievance channels in case they encountered any discrimination cases.
5. There was no evidence of sexual harassment.

Evidence examined:

1. Anti-discrimination policy and social accountability manual
2. The hiring and termination procedure, leave application records and employee handbook
3. Attendance records
4. Training records
5. Termination records

7. No discrimination is practiced

Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)?	0%
Representation of women in managerial roles (ratio of women workers to women managers)	0%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	0%
Three most common nationalities in managerial and supervisory roles	China

8. Regular employment is provided

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Policies and Procedures: The company recruitment policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: The manager received relevant social responsibility training, including regular employment. They used this knowledge to develop effective procedural documents and to conduct training for factory workers. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. The manager strictly followed and monitored the execution of the procedure to ensure regular employment was provided to workers.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

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

Current Systems:

1. All workers were recruited by the factory directly and had properly signed contracts with the factory.
2. No labour agency was used to hire workers.
3. No temporary worker or home worker was identified by auditor.
4. Additionally, all of the workers were properly provided with one copy of the labour contract for his or her reference.

Evidence examined:

1. Recruitment policy
 2. The hiring and termination practices
 3. Personal files and labour contracts
 4. Interview with management interview and workers
-

8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

8.A. Sub-contracting and homeworkers are used responsibly

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: The company subcontractor and homeworkers management procedures outlining the systems in place to manage this issue at the site. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Training is conducted according to a documented plan/ procedure, which includes assessment and refresher training. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. The manager strictly followed and monitored the execution of the procedure if subcontractors and homeworkers were used. But the records were lost.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

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

Current Systems:

1. A site tour showed that all production processes were present in the unit.
2. No sub-contracting was used in the facility.
3. As per management interview and factory tour, there was not homeworker used by the factory.

Evidence examined:

1. List of approval supplier
 2. Production records
 3. Interview with management and workers
 4. Site tour
-

8.A. Sub-contracting and homeworkers are used responsibly

Data points

Are homeworkers employed directly or engaged through an agent?

Not applicable

Gender disaggregated data available

Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homeworker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers?

No

No homeworkers were used.

Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?

No

No sub-contracting was used in the facility.

Are any sub-contractors used?

No

9. No harsh or inhumane treatment is allowed

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Robust Management Systems
Monitor the effectiveness of procedures to meet policy and workplace requirements	Robust Management Systems
Explanation for management systems grades	1.Policies and Procedures: Sites had provided evidence that they have developed policies and procedures about no harsh or inhumane treatment to ensure ongoing compliance with all the Workplace Requirements within the Base Code Area. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: Training is conducted according to a documented plan/ procedure, which includes assessment and refresher training. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. Sites had provided evidence that they effectively monitor the implementation of procedures put in place to ensure ongoing compliance.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

1. According to the documentation, the facility management had established a disciplinary procedure for employees' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all employees on the procedure. Employee interview confirmed that employees were aware of the disciplinary procedure.
2. As per management interview, document review and employee interview, there was a policy on Harsh Treatment.
3. There was an internal process for grievance, which was an anonymous suggestion box, where employees can report any grievances (harassment, bullying and discrimination), any received complaint will be handled by management, without any reprisal for the employee in question. All sampled employees were aware this system.

Evidence examined:

1. The relevant policy on prevention of harassment and abuse
2. Internal grievance procedure documentation
3. Disciplinary action records
4. Grievance records
5. Training records
6. Interview with management and workers

9. No harsh or inhumane treatment is allowed

Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	Yes, there is a formal grievance process
	The grievance process is available to all workers
	The grievance process is available to members of the local community
What type of grievance mechanism(s) are available?	Worker representatives, Suggestion box
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

10.A. Environment 2-Pillar

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Some Improvements Recommended
Monitor the effectiveness of procedures to meet policy and workplace requirements	Some Improvements Recommended
Explanation for management systems grades	1.Policies and Procedures: The company environmental documents outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documentation clearly assigns responsibilities, processes, and addresses all code areas - they could be considered sound. 2.Resources: The role(s) responsible for this Base Code Area requires the necessary skills and has the seniority to manage Workplace Requirements. 3.Communication and Training: The manager received environmental protection related law training. They used this knowledge to develop effective procedural documents and to conduct training for factory workers. However, there is no clear practice to show that the factory is taking environmental action. 4.Monitoring: Mr. Wang/ Manager was in charge of monitoring procedures and metrics collection defined by procedure and evidence of implementation available. but there was no mechanism to monitor whether the procedures were implemented by workers.

Summary of findings

Code area	Workplace requirement	Local law	Finding
			No findings

Systems and evidence examined to validate this code section

Current Systems:

- 1.The factory management maintained all legally required environmental documents in place which proved that the production of the factory was in compliance with the related environmental regulations.
- 2.Based on worker's interview, they were trained on environmental protection.
- 3.Factory provided the EIA Report form and Approval provided for review.

4.

Evidence examined:

- 1.Environmental policy
- 2.Energy bills
- 3.Water bill
4. Renewal energy specification
5. Worker and management interview.
6. Site tour

10.A. Environment 2-Pillar

Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?	No
Does the site have any valid environmental or energy management certificates?	No environmental or energy management certificate.
Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?	No
Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?	No

Attachments



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