

Monitored Party	amfori ID	Address
Zhongshan KEBASHI electric appliance Co.,LTD.	156-040191-000	2 of Fifth Floor, No. 10 Yongyi 1st Road, Yong Xing Industrial Park, Henglan Town , 528478 Zhongshan, Guangdong Sheng, China
Monitoring Activity	Monitoring Type	Monitoring Partner
amfori Social Audit - Manufacturing	Full Monitoring	TUV Rheinland
Monitoring Start Date	Closing Meeting Finished Date	Submission Date
12/09/2024	12/09/2024	18/09/2024
Expiration Date	Announcement Type	
18/09/2025	Semi Announced	
Site	Site amfori ID	
Zhongshan KEBASHI electric appliance co., LTD	156-040191-001	

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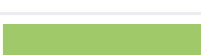

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## OVERALL RATING



## SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	A	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	B	

PA 6: Decent Working Hours	<b>D</b>	
PA 7: Occupational Health and Safety	<b>A</b>	
PA 8: No Child Labour	<b>A</b>	
PA 9: Special Protection for Young Workers	<b>A</b>	
PA 10: No Precarious Employment	<b>A</b>	
PA 11: No Bonded, Forced Labour or Human Trafficking	<b>A</b>	
PA 12: Protection of the Environment	<b>A</b>	
PA 13: Ethical Business Behaviour	<b>A</b>	

## GENERAL DESCRIPTION

Name of lead auditor: Eva Huang; APSCA membership number: CSCA 21702973.

Monitoring partner name: TUV Rheinland.

Audit schedule details: The audit was planned for 1 auditor in 1 day.

Announcement Type: Semi-Announced Audit.

Business partner information:

The factory was specialized in manufacturing Ceiling fans, and the main production process included assembly, testing, packing. The factory was established in 2017 and was located at 2 of Fifth Floor, No. 10 Yongyi 1st Road, Yong Xing Industrial Park, Henglan Town, Zhongshan City, Guangdong Province, China(中国广东省中山市横栏镇永兴工业区永谊一路10号五楼之二).

Remark: the address of business license was '中山市横栏镇永兴工业区永谊一路10号五楼之二', but the factory actual rented the part of 1F&2F&6F, and whole 3F-5F of one 6-storey building. On the other hand, the factory's business license added a new address in May 2024: sixth floor decile of the first building, No. 11 Chengnan Second Road, South District, Zhongshan City. According to management interviews, worker interviews and document review, the building at this address is still under construction and is 20 kilometers away from the current address.

Audited location information:

The factory rented part of 1F, 2F and 6F, the whole 3F-5F of one 6-storey building, with total 7480 square meters. No canteen, kitchen or dormitory was provided.

The other part of 1F,2F and 6F were rented by other factories (e.g. packing factory, lighting factory), which had independent business license, it did not share worker, machine and management with audited factory, there was no business relationship with audited factory and they were out of scope of this audit.

Operating shifts and hours:

The specific working hours of production workers were: 08:00-12:00,13:30-17:30, overtime started from 18:30-20:30. Total 8 sampled workers' attendance records from August 01, 2023 to audit date were reviewed, it was found that maximum 2 hours overtime per day, 18 hours overtime per week, 72 hours overtime per month, and 1 day off after 6 consecutive working days were guaranteed. Workers indicated that all overtime was voluntary.

Time recording system: Workers used face identification attendance machine to record working hours.

Salary payment details:

Total 8 sampled workers' wage records from August 2023 to July 2024 were reviewed, it noted that all workers were calculated at hourly rate and the minimum hourly rate was RMB 11.5, it was equal to RMB 2000 per month, which was higher than local legal minimum wage (RMB 1900 per month since December 01, 2021). Workers were paid on or before 30th of each month by cash. Workers were compensated 150%, 200%, 300% of normal hourly wage if overtime worked in working days, rest days, holidays. The pay slips also provided by factory on the wage issue date. The post allowance was provided. There was no illegal deduction made from workers' wage.

Worker number information:

Total 46 workers including 37 production workers and 9 non-production workers, there were 8 local workers and 38 domestic migrant workers (including 15 domestic male workers and 23 domestic female workers). The 37 production workers included 18 male workers and 19 female workers.

Good practices: The post allowance was provided.

Worker organization details:

No trade union was identified in the audited, nor collective bargaining agreement was signed. All workers voted on July 11, 2024 to elect 1 worker representative in fair and open environment.

Circumstances:

The workers and management of factory were very cooperative with the audit. No negative comments were made. There

was no special circumstance during the audit.

Summary of findings:

Findings were identified in PA1,2, 5, 6,7 and 13.

PA1: management system implementation and capacity planning procedures were not in place.

PA2: inadequate long-term goals for worker protection management.

PA5: did not calculate the living wage; insufficient social insurance.

PA6: workers' monthly overtime exceeded 36 hours.

PA7: inadequate PPE management; did not post warning sign; incomplete evacuation plan.

PA13: business license address did not cover all area.

Living wage calculation:

#LivingWage a. No anker wage available for the producer location, so we used the data provided by auditing company; b. The calculation methodology refers to anker living wage structure; c. The data comes from the local bureau of statistics for the current year.

Attachment:

The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit.

The factory did not obtain any government waiver, so the government waiver was NA. No collective bargaining agreement, agency labor or contractor labor was identified, so these relevant documents were NA.

SITE DETAILS

Site

Zhongshan KEBASHI electric  
appliance co., LTD

Site amfori ID

156-040191-001

GICS Classification

Sector	Industry Group	Industry
Consumer Discretionary	Consumer Durables & Apparel	Household Durables
Sub Industry		
Household Appliances		

amfori Process Classifications

N.A.

NACE Classification

Manufacture of domestic appliances

GS1 Classifications

N.A.

Water Stress Situation

N.A.

## METRICS

### Key Metrics

Total workforce	46	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	2,000	Monthly
Calculated living wage in local currency	2,233.62	Monthly
Total sample	8	Workers

### Other Metrics

Male workers	23	Workers
Female workers	23	Workers
Non-binary workers	0	Workers
Permanent workers - Male	23	Workers
Permanent workers - Female	23	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	2	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	15	Workers
Domestic migrant workers - Female	23	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	23	Workers
Workers hired directly - Female	23	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	4	Workers
Sample - Female	4	Workers
Sample - Non-binary	0	Workers

## FINDINGS

### PA1: Social Management System

Site: Zhongshan KEBASHI electric appliance co., LTD | Site amfori ID: 156-040191-001

**Question:** 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially complied with the principle. According to document review, on-site observation, management interviews, and worker interviews, although the factory had established and implemented a social responsibility management system, some of the management procedures had not been thoroughly implemented, resulting in problematic points still appearing in PA1, 2, 5, 6, 7 and 13, such as systematic monthly overtime work by workers exceeding that permitted by the regulations, and negligence in health and safety management, did not update the business license in time. The management stated that it would work to improve its social responsibility performance. The requirements in the amfori BSCI system manual were violated.	工厂部分遵守该原则。根据文件查阅，现场观察、管理层访谈和员工访谈，虽然工厂建立并实施了社会责任管理体系，但是部分管理程序并没有得到彻底的实施，导致PA1, 2, 5, 6, 7, 13中出现问题点，比如工人系统性的月加班超出法规允许、健康安全存在疏忽、没有及时更新营业执照等。管理层表示会努力提高社会责任表现。违反了amfori BSCI系统手册中的要求。

**Question:** 1.4 Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially complied with the principle. Based on document review, management interviews, and worker interviews, the facility had established a production cost and capacity control program, but the procedure had not been effectively implemented, resulting in workers' monthly overtime systematically exceeding the limits allowed by local regulations for the past 12 months. Management indicated that overtime hours were currently difficult to fully comply with regulatory requirements and that they would gradually reduce overtime hours. The requirements in the amfori BSCI system manual were violated.	工厂部分遵守该原则。基于文件查阅，管理层访谈和员工访谈，工厂虽然建立了生产成本和产能控制程序，但该程序并没有有效实施，导致过去12个月工人的月加班系统性超过当地法规允许的限值。管理层表示加班时间目前难以完全符合法规要求，他们会逐步降低加班时间。违反了amfori BSCI系统手册中的要求。

### PA 2: Workers Involvement and Protection

Site: Zhongshan KEBASHI electric appliance co., LTD | Site amfori ID: 156-040191-001



**Question: 2.2** Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The factory partially complied with the principle. According to the document review, worker interviews, and management interviews, while the factory had established a long-term goal for worker protection, the goal had been developed without the participation of worker representatives and without an implementation plan. Management indicated that they were not previously aware of the requirement. The requirements in the amfori BSCI system manual were violated.

工厂部分遵守该原则。根据文件评审、工人访谈以及管理层访谈，工厂虽然建立了保护工人的长期目标，但在制定该目标时并没有让工人代表参与，同时也没有制定实施计划。管理层表示之前不清楚该要求。违反了amfori BSCI系统手册中的要求。

**PA 5: Fair Remuneration**

Site: Zhongshan KEBASHI electric appliance co., LTD | Site amfori ID: 156-040191-001

**Question: 5.4** Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The factory partially complied with the principle. According to the document review, worker interviews and management interviews, the factory did not calculate the living wage of the workers. The worker interview showed that the remuneration provided by the factory was sufficient for daily needs. The management explained that the remuneration offered was higher than the local minimum wage. The requirements in the amfori BSCI system manual were violated.

工厂部分遵守该原则。根据文件评审、工人访谈以及管理层访谈，工厂并没有计算工人的生活工资。工人访谈表示工厂所提供的报酬足够日常所需。管理层表示所提供的报酬高于当地的最低工资。违反了amfori BSCI系统手册中的要求。

**Question: 5.5** Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The factory partially complied with the principle. According to workers' interviews, management interviews and social insurance records, the factory had 46 workers (including 3 retired workers), so 43

工厂部分遵守了该原则。根据工人访谈、管理层访谈以及社保记录，工厂有46名工人（包含3名退休工人），因此应为43名工人购买社保。但在2024年8月，43名符合条件的工人中的3名工人没有购买失

### Finding

workers should buy social insurance. However, in August 2024, 3 eligible workers did not purchase unemployment, medical, maternity, pension and work-related injury insurance. The worker interview said that they had purchased local medical insurance. The management expressed respect for the workers' ideas. This was in violation of articles 10, 23, 33, 44 and 53 of the Social Insurance Law of the People's Republic of China. Remark: the factory provided commercial insurance for 20 workers(including 3 workers who did not purchased social insurance) and 3 retired workers, valid from November 28, 2023 to November 27, 2024.

业、医疗、生育、养老以及工伤保险。工人访谈表示他们购买了当地的医疗保险。管理层表示尊重工人的想法。违反了《中华人民共和国社会保险法》第10, 23, 33, 44, 53条。备注：工厂给20名工人（包含了3名没有购买社保的工人以及3名退休工人）购买了商业保险，有效期从2023年11月28日到2024年11月27日。

## PA 6: Decent Working Hours

Site: Zhongshan KEBASHI electric appliance co., LTD | Site amfori ID: 156-040191-001

**Question:** 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

### ENGLISH

### LOCAL LANGUAGE

### Finding

The factory did not comply with the principle. Based on document review, management interviews, and worker interviews, workers' monthly overtime systematically exceeded 36 hours. The attendance records of the 8 sampled workers from August 01, 2023 to audit date were reviewed, October 2023, March 2024 and July 2024 were sampled, the overtime details were below: In October 2023, all sampled workers monthly overtime exceeded 36 hours, and the maximum was 62 hours; In March 2024, all sampled workers monthly overtime exceeded 36 hours, and the maximum was 72 hours; In July 2024, all sampled workers monthly overtime exceeded 36 hours, and the maximum was 68 hours. Workers indicated that the overtime was all voluntary. The management stated that the monthly overtime would be gradually controlled. This violates Article 41 of the Labor Law of the People's Republic of China. Remark: From September 01, 2024 to audit date, the maximum monthly overtime for sampled workers was 24 hours.

工厂未遵守该原则。基于文件查阅、管理层访谈和工人访谈，工人的月加班系统性地超过36个小时。根据8名抽样工人从2023年8月1日至审核当天的考勤记录，2023年10月、2024年3月以及2024年7月被抽样，具体的加班情况如下：在2023年10月，所有抽样工人的月加班均超过36个小时，最大的为62小时；在2024年3月，所有抽样工人的月加班均超过36个小时，最大的72小时；在2024年7月，所有抽样工人的月加班均超过36个小时，最大的68小时。工人表示加班都是自愿的。管理层表示会逐渐控制月加班。违反了中华人民共和国劳动法第41条。备注：从2024年9月1日到审核当天，抽样员工最大月加班为24小时。

## PA 7: Occupational Health and Safety

**Question:** 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially complied with the principle. Based on site observations, worker interviews, and management interviews, it was observed that two workers were using a manual forklift to move loads, but were not wearing safety shoes to protect their feet from falling loads. Management indicated that this risk had not been previously identified. This was in violation of article 45 of Work Safety Law of the People's Republic of China (2021).	工厂部分遵守了该原则。根据现场观察、工人访谈以及管理层访谈，发现2名工人正在使用手动叉车进行搬运货物，但并没有穿劳保鞋以防货物坠落砸脚。管理层表示之前没有识别到该风险。违反了《中华人民共和国安全生产法》（2021）第45条。

**Question:** 7.9 Is there satisfactory evidence that the auditee makes visible potential hazards to the workers and visitors through signs and warnings?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially complied with the principle. According to on-site observation, worker interviews and management interviews, the factory did not post warning signs on the all freight elevators, such as "no carrying people" and "no use of fires". The management said that it would rectify it as soon as possible. This was in violation of article 35 of Work Safety Law of the People's Republic of China (2021).	工厂部分遵守该原则。根据现场观察、工人访谈以及管理层访谈，工厂并没有在所有货梯张贴警示标识，比如“禁止载人”，“火灾禁止使用”等。管理层表示会尽快整改。违反了《中华人民共和国安全生产法》（2021）第35条。

**Question:** 7.16 Is there satisfactory evidence that the auditee ensures evacuations plans meet legal requirements and that these plans are posted in relevant places so workers can see and understand them?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
The factory partially complied with the principle. Based on on-site observations, worker interviews, and management interviews, it was found that the evacuation plan posted by the factory did not fully comply with the representation, for example, there were no icons of fire-fighting equipment and safety exits, but their locations were directly labeled on the plan; the location of the emergency assembly point was not clear. The management explained	工厂部分遵守该原则。根据现场观察、工人访谈以及管理层访谈，发现工厂所张贴的疏散平面图并不完全符合表示，比如并没有消防设备，安全出口的图标，而是直接在图上标注了他们的位置；紧急集合点的位置并不明确。管理层解释之前理解错误，会尽快整改。违反了《疏散平面图 设计原则与要求》GB/T25894-2010第5条。

### Finding

that they had misunderstood and would rectify the situation as soon as possible. This was in violation of article 5 of escape and evacuation plan-Design principles and requirements GB/T25894-2010.

## PA 13: Ethical Business Behaviour

Site: Zhongshan KEBAISHI electric appliance co., LTD | Site amfori ID: 156-040191-001

**Question:** 13.2 Is there satisfactory evidence that the auditee keeps accurate information regarding its own activities, structure and performance?

### ENGLISH

### LOCAL LANGUAGE

### Finding

The factory partially complied with the principle. According to on-site observations, document reviews, worker interviews, and management interviews, the factory did not update its business license address in a timely manner. The address of the factory's business license was 2 of Fifth Floor, No. 10 Yongyi 1st Road, Yong Xing Industrial Park, Henglan Town, Zhongshan City, but in fact, it rented part of the 1F, 2F, and 6F, and the whole 3F-5F, which the management explained could not be changed due to planning issues. This was in violation of article 27 of Regulations of the People's Republic of China on the Registration of Market Entities.

工厂部分遵守该原则。根据现场观察、文件评审、工人访谈以及管理层访谈，工厂并没有及时更新营业执照的地址。工厂的营业执照地址为中山市横栏镇永兴工业区永谊一路10号五楼之二，但实际上使用了1栋6层厂房的部分1楼、2楼以及6楼，整层的3楼-5楼，管理层解释因规划问题无法变更。违反了《中华人民共和国市场主体登记管理条例》第27条。