

# Monitoring result for Simlok Electronic Manufactory Co.,Ltd on site Simlok Electronic Manufactory Co.,Ltd

## Monitoring

Monitored Party	: Simlok Electronic Manufactory Co.,Ltd
amfori ID	: 156-046178-000
Site	: Simlok Electronic Manufactory Co.,Ltd
Site amfori ID	: 156-046178-001
Address	: No.14, Junxin industry zone, Xintian, Guanlan town, Longhua District : 518000, Shenzhen : Guangdong Sheng : China
Monitoring Activity	: amfori Social Audit - Manufacturing
Monitoring Type	: Full Monitoring
Monitoring Partner	: Bureau Veritas Hong Kong Limited
Monitoring Start Date	: 25/04/2023
Closing Meeting Finished Date	: 25/04/2023
Submission Date	: 04/05/2023
Expiration Date	: 04/05/2024

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## Overall rating



## Section rating

PA1: Social Management System	C
PA 2: Workers Involvement and Protection	B
PA 3: The Rights of Freedom of Association and Collective Bargaining	A
PA 4: No Discrimination	A
PA 5: Fair Remuneration	B
PA 6: Decent Working Hours	D

PA 7: Occupational Health and Safety	A
PA 8: No Child Labour	A
PA 9: Special Protection for Young Workers	A
PA 10: No Precarious Employment	A
PA 11: No Bonded Labour	A
PA 12: Protection of the Environment	A
PA 13: Ethical Business Behaviour	A

## General description

At the beginning of the audit, Ms. Sherry Li/General manager, Ms. Tang Xiaoqun/ Worker Representative attended the opening meeting.

The factory was established on September 08, 2017 and specialized in the manufacture of Alarm clock radio, Bluetooth Speaker, Outdoor party speaker, Wireless Charger speaker, Wooden Radio and Alarm Clock. Business license number was 91440300MA5EQ8N92L. Factory name in English was Simlok Electronic Manufactory Co.,Ltd. Factory local name was 信数科技（深圳）有限公司. Factory address in English was No.14, Junxin industry zone, Xintian, Guanlan town, Longhua District, 518000 Shenzhen, China. Factory address on business license was 深圳市龙华区观湖街道新田社区君新工业区14号万顺祥厂厂房201. The factory rented part of 2nd floor of one 3-storey production building as workshops, warehouse and office and neither canteen nor dormitory was provided by factory. Total construction area was about 700 square meters. The main production processes included assembly, testing and packing.

There were a total of 30 employees with 25 production workers and 5 non-production staffs in the factory. The youngest employee noted during this audit was 22 years old. According to factory management representation, there was no obvious peak season in the factory during the year.

The factory adopted face scanning or fingerprint scanning time recording system to record employees' working hours. There was only one working shift for Production workers and office staff, which was 8:00 to 12:00 and 13:30 to 17:30.

Employees' wages were paid before 7th of each month after the payment period by cash with wage stubs issued. Per payroll review and interviews with management and employees, all employees were paid by hourly rate.

During the audit, time records and payrolls of 15 employees were sampled as follows for working hour and wage testing: 5 samples from current paid month of March 2023, 5 samples from random months of December 2022 and September 2022 respectively. It was noted that all sampled employees were paid at least RMB 13.56 per hour for normal working hours, which was same as local minimum wage RMB13.56 per hour since Jan 1, 2022. Based on the samples, all employees were compensated with no less than 150% and 200% of normal wages for overtime hours on regular days and rest days respectively, which was compliance with legal requirement. No overtime was found on statutory holidays. According to the sampled time records, the maximum monthly overtime hours were 70 hours while maximum daily overtime hours were 2 hours. All sampled employees obtained at least one day off every seven consecutive days.

According to the social insurance payment receipt provided by factory management, it was noted that only 2 out of 30 employees (6.7%) were provided with pension insurance, accident insurance, unemployment insurance, maternity insurance and medical insurance in March 2023. Furthermore, the factory provided all 30 employees with commercial accident insurance, which was valid from April 12, 2023 to April 11, 2024.

Further, 5 employees were selected for private interviews from different workshops. No negative comment was issued during employee interviews. Interviewed employees were satisfied with the working environment, compensation, working hour and management team in the factory.

During the closing meeting, auditor provided the factory representatives with a general overview and explained all of the findings to them. Ms. Sherry Li/General manager and Ms. Tang Xiaoqun/ Worker Representative signed the onsite CAP and agreed to take corrective action.

### Remark:

1. No agency or contractor was used by the auditee. No government waiver was obtained by the auditee. No Collective bargaining agreement in the auditee.

2. Audit Company: Bureau Veritas Consumer Products Service

Audit Company APSCA Number: 11600002

Lead Auditor Name: Sophia He

APSCA Auditor Registered Number: CSCA21701153

Announcement type: Fully Announced

Monitoring date: April 25, 2023

3. There were other factories located at the same production building with the auditee. Here were some factories list below:

The part of 2nd of production building was occupied by Shenzhen Linchen Plastic Products Co., Ltd.

The 3rd floor of production building was occupied by Shenzhen Yicheng Industrial Co., Ltd

1st floor was occupied by Shenzhen Wanshunxiang Electronic Co., Ltd. 深圳市万顺祥电子有限公司

Individual business licenses were checked on line and management system were different through onsite observation.

Employee interview revealed that no employee co-mingling among the audited facility and the other facilities was observed.

Hence the other facilities were not included in this audit.

Site Details

Site : Simlok Electronic Manufactory Co.,Ltd  
Site amfori ID : 156-046178-001

GICS Classification

Sector	: Consumer Discretionary	Industry	: Household Durables
Industry Group	: Consumer Durables & Apparel	Sub Industry	: Consumer Electronics

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

N.A.

## Metrics

### Key Metrics

Total workforce	30 Workers
Legal minimum wage in local currency	2360 Monthly
Lowest wage paid for regular work at the site	2360 Monthly
Calculated living wage in local currency	3235 Monthly
Total sample	5 Workers

### Other Metrics

Male workers	14 Workers
Female workers	16 Workers
Permanent workers - Male	14 Workers
Permanent workers - Female	16 Workers
Temporary workers - Male	0 Workers
Temporary workers - Female	0 Workers
Seasonal workers - Male	0 Workers
Seasonal workers - Female	0 Workers
Management - Male	2 Workers
Management - Female	3 Workers
Apprentices - Male	0 Workers
Apprentices - Female	0 Workers
Workers on probation - Male	0 Workers
Workers on probation - Female	0 Workers
Workers with night shift - Male	0 Workers
Workers with night shift - Female	0 Workers
Workers with disabilities - Male	0 Workers
Workers with disabilities - Female	0 Workers
Domestic migrant workers - Male	7 Workers
Domestic migrant workers - Female	5 Workers
Foreign migrant workers - Male	0 Workers
Foreign migrant workers - Female	0 Workers
Workers hired directly - Male	14 Workers
Workers hired directly - Female	16 Workers
Workers hired indirectly - Male	0 Workers
Workers hired indirectly - Female	0 Workers
Unionised workers - Male	0 Workers
Unionised workers - Female	0 Workers
Workers under CBA - Male	0 Workers
Workers under CBA - Female	0 Workers
Pregnant workers	0 Workers
Workers on parental leave - Male	0 Workers
Workers on parental leave - Female	0 Workers
Sample - Male	2 Workers
Sample - Female	3 Workers

## Findings

### PA1: Social Management System

The main auditee partially respected this principle because the factory had established management system according to amfori BSCI requirement, and the management knew basic requirement of amfori BSCI, but due to factory didn't effectively implement it, lead to some issues appeared in PA1, PA2, PA5, PA6 and PA7. This violated Performance Area 1: Social Management System and Cascade Effect 1.1.

主要被审核方（生产商）部分遵守原则，原因是工厂有按照amfori BSCI要求建立相关体系，且管理者代表了解amfori BSCI基本要求，但由于未有效执行，导致在PA1,PA2, PA5, PA6 和PA7出现问题。根据执行领域1：社会管理体系和级联效应1.1

The factory did not recruit enough employees or organize its workforce capacity to meet the expectations of the delivery order and/or contracts, so that employees' overtime hours exceeded legal limit. The facility established capacity planning procedure, but it was not implemented effectively. Please refer to BSCI PA 1.4: The auditee should organize its workforce capacity to meet the expectations of the delivery order and/or contracts.

审核发现工厂没有足够的员工或者进行良好的生产组织来达成交付订单和/或合同预期，以至于员工加班超出法律规定。工厂制定了产能规划程序，但未有效实施。请参看BSCI PA1.4：被审核方（生产商）组织其劳工来达成交付订单和/或合同预期和要求。

### PA 2: Workers Involvement and Protection

It was noted that although the main auditee had established a long term goal to protect workers according to the Amfori BSCI Code of Conduct, worker and worker representative did not involve in establishing the long term goal. BSCI Code of Conduct: The auditee defines long-term goals to protect workers according to the BSCI Code of Conduct.

审核发现虽然被审核方已经根据Amfori BSCI行为准则建立了长期目标来保护员工，但是员工和员工代表没有参与该长期目标的制定。BSCI行为守则：被审核方（生产商）按照BSCI行为守则明确长期目标以保护工人。

The factory had provided training on BSCI Code of Conduct to all employees and BSCI Code of conduct was also posted onsite for employees' reference. However, some workers were not aware of BSCI Code of Conduct according to interview. BSCI Code of Conduct: The auditee builds sufficient competence to successfully embed responsible practices in the business operation.

This refers to managers, workers and workers representatives.

工厂有对所有员工进行了BSCI行为守则培训，并且现场张贴了BSCI行为守则供员工阅读，但是通过访谈，部分工人不了解BSCI行为守则。BSCI行为守则：被审核方（生产商）充分培养下列人士的能力，以便在业务经营中成功结合责任规范，包括经理、工人和工人代表。

### PA 5: Fair Remuneration

It was noted that the social insurance coverage was insufficient. According to the social insurance payment receipt provided by factory management, it was noted that only 2 out of 30 employees (6.7%) were provided with pension insurance, accident insurance, unemployment insurance, maternity insurance and medical insurance in March 2023. Furthermore, the factory provided all 30 employees with commercial accident insurance, which was valid from April 12, 2023 to April 11, 2024. In accordance with Article 73 of the Labor Law of the People's Republic of China

审核员发现工厂的社会保险覆盖不足。根据厂方提供的2023年3月社会保险缴费单据显示工厂仅为2/30员工（6.7%）购买了养老，医疗，工伤，失业和生育保险。另外工厂给全体30名员工提供了商业意外险，有效期从2023年4月12日到2024年4月11日。根据《中华人民共和国劳动法》第73条。

### PA 6: Decent Working Hours

It was noted that 15 out of 15 sample population employees worked in excess of the statutory overtime hour limits (no more than 36 overtime hours per month). A review of the sample population employees' time records (5 samples from current paid month of March 2023, 5 samples from random months of December 2022 and September 2022 respectively) yielded the following:

1) In March 2023, 5 out of 5 sample population employees worked 66 overtime hours per month. 2) In December 2022, 5 out of 5 sample population employees worked 70 overtime hours per month. 3) In September 2022, 5 out of 5 sample population employees worked 62 overtime hours per month. This violated Article 41 of the Labor Law of the PRC.

根据厂方提供的工时记录，审核员发现员工加班时间超出了法定标准。审核员抽取15个样本（从最近工资支付月2023年3月，2022年12月和2022年9月各抽取5个样本），发现共有15名员工加班时间超出了法定标准（每月加班时间不能超过36小时），具体为：（1）2023年3月，5/5名员工的月加班时间为66小时。（2）2022年12月，5/5名员工的月加班时间为70小时。

（3）2022年9月，5/5名员工的月加班时间为62小时。根据《中华人民共和国劳动法》第41条。

### PA 7: Occupational Health and Safety

It was noted that the factory did not provide the occupational health checks to workers who were in contact with hazardous materials (such as dust and detergent) yearly when they were on the post. Furthermore, the occupational health checks were

## PA 7: Occupational Health and Safety

not provided to employees before they took the posts or left the posts. In accordance with Article 35 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases

审核发现厂方没有为接触有毒有害物质（如粉尘和正己烷）的员工提供定期职业病体检，并且工厂并没有组织这些员工在上岗前和离岗后进行职业病体检。根据《中华人民共和国职业病防治法》第35条。

It was noted that 1 soldering worker working in the assembly workshop was not wearing active carbon masks provided by the auditee. 1 worker in assembly workshop using detergent was not wearing active carbon mask and rubber gloves and only cotton gloves were worn. Other workers wore PPE properly if needed during working hours. According to Article 42 of Law of the People's Republic of China on Production Safety.

审核员发现工厂组装车间有1名焊锡工没有佩戴工厂提供的活性炭口罩和1名使用清洁剂（抹机水）的员工没有佩戴活性炭口罩和橡胶手套，仅佩戴了棉纱手套。其他有需要的员工在工作期间均正确佩戴劳保用品。根据《中华人民共和国安全生产法》第42条。

It was noted that 1 bottle of detergent being using in the assembly workshop was not posted with a safety label and only content label was posted. In accordance with Article 14 of the Regulation For Chemical Usage Safety in Work Place.

审核发现组装车间使用的1瓶抹机水没有张贴安全标签，仅仅张贴了内容标签。根据《工作场所安全使用化学品规定》第14条。