

Monitored Party Prowess Technology Limited	amfori ID 156-010675-000	Address Room 301, Building 11, 18 Chunfeng Road, Longbeiling, Tangxia Town, 523710 Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 26/05/2025	Closing Meeting Finished Date 26/05/2025	Submission Date 03/06/2025
Expiration Date 03/06/2026	Announcement Type Semi Announced	
Site Prowess Technology Limited	Site amfori ID 156-010675-001	

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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	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, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Vincent Xie; APSCA membership number: CSCA21702075

Monitoring partner name: TUV Rheinland

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

Announcement Type: Semi-Announced

Business partner information:

The auditee was established in 2021 and located at Room 301, Building 11, 18 Chunfeng Road, Longbeiling, Tangxia Town, Dongguan City, Guangdong Province, China (中国广东省东莞市塘厦镇龙背岭春风路18号11栋301室). (Remark: The direct translation of the business license address was "Room 301, Building 11, 18 Chunfeng Road, Longbeiling, Tangxia Town, Dongguan City, Guangdong Province (广东省东莞市塘厦镇龙背岭春风路18号11栋301室), but the auditee actually rented and used the 3F and 4F of the building, the management confirmed that at the request of the local industrial and commercial department, the business license was registered to the specific building number and room number, so the auditee's business license was registered to Room 301. The auditee confirmed that the address used in the report is in line with the business.)

The auditee specialized in manufacturing of Bluetooth speaker, lighting; the main production processes included assembling, inspection and packing, no product or process was subcontracted; no obvious peak season in the factory.

Audited location information:

The auditee rented and used the 3F and 4F of one 4-storey building in the industrial park as production/warehouse and office area, total rented and used areas were about 2400 square meters; other floors were rented and used by another independent company specified in metal/plastic products manufacturing; no worker/management or production/warehouse areas were mixed using between the auditee and the other company; this audit only focused on the areas rented and used by the auditee. No dormitory or canteen/kitchen was provided by the auditee. (remark: the auditee rented and used 3 rooms of the dormitory building (6#) in the industrial park before, but since Jan. 2024; the auditee did not rent the dormitory and provided dormitory for workers anymore.)

Operating shifts and hours:

During the audit, the attendance records from 1 May 2024 to the audit day were provided and 8 samples were randomly selected for analysis; one shift was arranged for workers 8:00-12:00, 13:30-17:30, regular overtime was conducted for 2 hours from 18:30 to 20:30; no Sunday or statutory holiday overtime arranged; the maximum daily, weekly and monthly overtime was 2/16/60 hours respectively. The regular overtime and rest day overtime were paid at 150% and 200% of the normal wage, respectively. Workers took the overtime voluntarily.

Time recording system: The auditee used the finger printing machine to record the working hours.

Salary payment details:

Workers were paid by hourly rate, the wage was issued around 25th of the following month by bank transfer. The payrolls from May 2024 to Apr. 2025 were provided during this audit; 8 workers were randomly selected from various sections for wage analysis. The minimum wage for workers was at least RMB12.65/hour (equal to RMB2200/month), which was higher than the local legal minimum wage: RMB11.95/hour (equal to RMB2080/month) since 1 Mar. 2025, RMB10.92/hour (equal to RMB1900/month) since Dec. 1, 2021. Legal benefits included statutory leaves, paid annual leave, etc., were defined and provided.

Worker number information:

There were total 42 employees worked in the factory, included 29 male and 13 female employees; 32 of them were production workers (included 23 male workers and 9 female workers) and 10 supporting and management employees; and 36 employees were domestic migrant workers (24 male and 12 female workers); no young, pregnant, seasonal, temporary, disabled, student, home-based workers engaged.

Good practice: Nil.

Worker organization details:

No trade union was available, one worker representative was elected and available in the factory.

Circumstances: The auditee management was cooperative during the audit; the findings were discussed with the management in the close meeting and the management representative promised to take the improvement action for the findings. There was no special circumstance during the audit.

Summary of findings:

There were findings identified in PA1/2/5/6/7

PA1: Insufficient management system implementation and production capacity planning

PA2: Improper worker protection goals management.

PA5: Insufficient social insurance, remuneration lower than the calculated basic needs wage in one of the sampled months.

PA6: Excessive monthly overtime

PA7: No occupational hazardous factors testing, insufficient occupational health management insurance, insufficient chemical management, no occupational hazards notification posted, no guardrails for the shipment platform.

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:

1. 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.

2. No labor agency, subcontractor was used by the auditee; and no collective bargaining agreement occurred, no government wavier was obtained; so there was no labor agency contract, subcontractor contract, collective bargaining agreements, government wavier attached into amfori BSCI platform.

SITE DETAILS

Site

Site amfori ID

Prowess Technology Limited

156-010675-001

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Household Durables

Sub Industry

Consumer Electronics

amfori Process Classifications

N.A.

NACE Classification

Manufacture of consumer electronics

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	42	Workers
Legal minimum wage in local currency	2,080	Monthly
Lowest wage paid for regular work at the site	2,200	Monthly
Calculated living wage in local currency	3,275.44	Monthly
Total sample	8	Workers

Other Metrics

Male workers	29	Workers
Female workers	13	Workers
Non-binary workers	0	Workers
Permanent workers - Male	29	Workers
Permanent workers - Female	13	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	24	Workers
Domestic migrant workers - Female	12	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	29	Workers
Workers hired directly - Female	13	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	5	Workers
Sample - Female	3	Workers
Sample - Non-binary	0	Workers

FINDINGS

PA1: Social Management System

Site: Prowess Technology Limited | Site amfori ID: 156-010675-001

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
Finding	
The auditee partially respected this principle because per site observation, management and worker interview, documents review, the auditee established the social responsibility management policy and procedures and implemented; however, there were gaps during the implementation, for example, the monthly OT hours exceeded legal requirements systematically, insufficient social insurance provided for workers; the management was aware of the gaps and stated that they improve the social responsibility performance continuously. It violated the requirement of the amfori BSCI system manual.	受审核方部分遵守了这一原则，因为通过现场观察、管理层和工人访谈、文件审核，受审核方制定了社会责任管理体系并实施；但在实施过程中存在差距，例如月加班工时系统性地超出了法律要求，社保提供不足；管理层了解存在的差距并表示会持续改善其社会责任绩效。这违反了 amfori BSCI 系统手册的要求。

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
Finding	
The auditee partially respected this principle because per management interview and documents review, the auditee defined the production capacity planning procedure and set up the production plan; however, the monthly OT hours of workers were not controlled during the capacity planning stage, the monthly OT hours of workers exceeded the legal requirements; the management stated that the OT hours were arranged based on the production needs. It violated the requirement of the amfori BSCI system manual.	受审核方部分遵守了这一原则，因为根据管理层访谈和文件审查，受审核方制订了产能规划程序并建立了生产计划；但是在产能规划阶段没有控制工人的月加班时间，工人的月加班时间超过了法定要求；管理层表示加班时间根据生产需求进行安排。这违反了 amfori BSCI 系统手册的要求。

PA 2: Workers Involvement and Protection

Site: Prowess Technology Limited | Site amfori ID: 156-010675-001

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 auditee partially respected this principle because per management interview and documents review, the auditee established the worker protection goals; however, there was no action plan to achieve these goals, and the gap of the goals (such as OT hours and social insurance) were not improved; the management stated they would enhance the goals management. It violated the requirement of the amfori BSCI system manual.	受审核方部分遵守了这一原则，因为根据管理层访谈和文件审查，受审核方制定了工人保护目标；但是没有实现这些目标的行动计划，没有对目标（如加班工时及社保）进行差距改善。管理层表示将会加强目标管理。这违反了 amfori BSCI 系统手册的要求。

PA 5: Fair Remuneration

Site: Prowess Technology Limited | Site amfori ID: 156-010675-001

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 auditee partially respected this principle because based on management interview and document review, the remunerations paid for workers were lower than the basic needs wage calculated by the audit bureau in one of the sampled months (Details as: in Apr. 2025, 6 out of 8 sampled workers' remuneration was lower than the calculated basic needs wage, the max. gap was RMB75.44; in Dec./Jul. 2024, all the 8 sampled workers' remuneration was higher than the basic needs wage of that time), per workers interview, workers felt the current remunerations were acceptable; the management stated that the wage was higher than the legal minimum wage. It violated the requirements of amfori BSCI System Manual.	受审核方部分遵守这一原则，因为根据管理层访谈和文件审查，支付给工人的报酬在抽样月份中的一个低于审核机构计算出的生活需求工资（详情如下：在2025年4月，8名抽样工人中有6名工人的报酬低于计算的生活需求工资，最大差距为RMB75.44元；在2024年12月/7月，所有抽样的8名工人的报酬均高于当时的生活需求工资），据工人访谈，工人觉得他们目前的报酬是可以接受的；管理层表示工资高于当地法定最低工资。这违反了 amfori BSCI 系统手册的要求。

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 auditee partially respected this principle because the auditee provided the social insurance	受审核方部分遵循该原则因为受审核方提供了过去一年的社保购买记录查阅，据最新的社保购买记录

Finding

payment records for the past year for review; per the latest insurance payment records (May 2025) review and management/worker interview, there were 36 out of 42 eligible employees not provided with retirement/unemployment/medical/maternity/injury insurance. There were total 42 employees in the factory; no retired worker and no new worker engaged. Per management and worker interview, workers joined the social insurance voluntarily; parts of them participated into the new cooperative medical system (NCMS) in their hometown, but the auditee did not collect and provide the information of NCMS for the related workers. Reference law: Social Insurance Law of the People's Republic of China; Article 10, Article 23, Article 33, Article 44, Article 53. Remark: The auditee purchased one commercial injury insurance covering all the rest workers not participated into the injury insurance, which would be valid till 9 Nov. 2025.

（2025年5月）及管理层/员工访谈，受审核方42名符合条件的员工中36人未提供养老、失业保险、医疗、生育、工伤保险。受审核方总计42名员工；未涉及退休员工及新员工。据管理层及员工访谈，员工自愿参保；部分员工在老家购买了新农村医疗合作保险，但是受审核方没有收集及提供新农合医保的信息。参考法律法规：中华人民共和国社会保险法，第10条，23条，33条，44条和53条。备注，受审核方购买了一份商业意外保险，涵盖了其余所有未参加工伤保险的员工，有效期至2025年11月9日。

PA 6: Decent Working Hours

Site: Prowess Technology Limited | Site amfori ID: 156-010675-001

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 auditee did not respect this principle because based on management and worker interview, attendance records review, the OT hours of workers systematically exceeded 36 hours per month. The auditee provided the attendance records from 1 May 2024 to the audit day for review, 8 workers' attendance records were sampled for analysis; the workers' OT hours exceeded 36 hours per month, the max. OT hours reached to 60 hours/month. The detailed OT hours of sampled months as below: 8 out of 8 sampled workers had monthly overtime work of 50-52/60/60 hours in Apr. 2025 /Dec. 2024/Jul. 2024 respectively; the max. Monthly OT hours from 1 to 25 May 2025 were 52 hours. Per document review and management interview, the working hour system could not alert the excessive OT hours, and the OT hours were arranged as per the production needs, it was hard to control the OT hours within

受审核方没有遵守这一原则，因为根据管理层和工人访谈以及对考勤查阅，工人的加班时间系统地超过了每月36小时。受审核方提供了2024年5月1日至审核日的考勤记录审查，抽查了8名工人的考勤记录进行分析；工人的加班时数超过每月36小时，最长加班时数达到每月60小时。抽查月份的详细加班时数如下：2025年4月/2024年12月/2024年7月，8名被抽样工人中有8名工人的月加班分别为50-52/60/60小时；2025年5月1日至25日的最大月加班时数为52小时。根据文件审查和管理层访谈，工时系统无法对超时加班进行预警，加班时间根据生产需要安排，很难将加班时间控制在法定要求范围内，工人加班都是自愿的。参考法规：中国劳动法，第41条。

Finding

legal requirements; workers took the OT hours voluntarily. Reference law: China Labour Law, Article 41.

PA 7: Occupational Health and Safety

Site: Prowess Technology Limited | Site amfori ID: 156-010675-001

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle because per document review, worker/ management interview, the auditee set up the occupational health management regulations, but no occupational hazardous factors testing was conducted; on-job occupational health examination was provided for the workers engaged into occupational hazardous factors(chemical/dust/ noise), but there was no pre-job/off-job occupational health examination provided for relevant workers, the management stated that it was due to cost reasons. Reference law: Provisions on the Administration of Occupational Health at WorkSites (2021) , Article 20; Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35.

受审核方部分遵守了这一原则，因为根据文件查阅、工人/管理层访谈，受审核方制定了职业健康管理制度，但未进行职业危害因素检测；工厂为接触危害因素（化成品/粉尘/噪声）工作的工人提供了在岗职业健康体检，但没有为相关工人提供岗前/离岗职业健康体检，管理层表示这是出于成本考虑。参考法律法规：《工作场所职业卫生管理规定》（2021）第20条；《中华人民共和国职业病防治法》第35条。

Question: 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected this principle because per site observation and management interview, 30% of the thinners/cleaning agents stored in the chemical areas missed the safety label and no secondary containers were equipped, the auditee set up the chemical management regulation, MSDS was posted onsite; the management stated it was due to the management

受审核方部分遵守了这一原则，因为根据现场观察和与管理层的访谈，化学品存放区存放的30%稀释剂/清洁溶剂缺少安全标签，未设置二次容器；受审核方建立了化学品管理规范，MSDS已在现场张贴；管理层表示因管理疏忽，他们将会尽快改善这一问题。参考法律法规：工作场所化学品安全使用条例，第12条；危险化学品安全管理条例，第20条。

Finding	
neglect, they would improve this issue soon. Reference Law: Regulation of Chemical Safety Usage in Workplace, Article 12 Regulation on the Safety Management of Hazardous Chemicals (2013), Article 20.	

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
Finding	
The auditee partially respected this principle because based on site observation, workers and management interviews, the auditee did not post the occupational hazards notification card for the soldering/gluing/cleaner using area and the chemical storage area, the management stated they provided the occupational hazards trainings to workers. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24.	受审核方部分遵守该原则因为通过现场观察，员工和管理层访谈，工厂焊锡/点胶/使用清洁剂的区域及化学品存放区域未张贴职业危害告知卡，管理层表示向员工进行了职业危害的培训。参考法规：《中华人民共和国职业病防治法》，第24条。

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH	LOCAL LANGUAGE
Finding	
The auditee partially respected this principle because per site observation, management interview, there was no guardrails equipped for the public shipment platform used in 1F, the management stated that it was a public platform and managed by the landlord. Reference law: Safety requirements for fixed steel ladders and platform - Part 3: Industrial guardrails and steel platform GB 4053.3-2009, Article 4.1.1.	受审核方部分遵守了这一原则，因为根据现场观察和管理层访谈，1楼使用的公共出货平台没有安装护栏，管理层称这是一个公共平台，由业主管理。参考法律法规：《固定式钢梯及平台安全要求第3部分：工业防护栏杆及钢平台》GB 4053.3-2009 第4.1.1条。