



**Walgreens
Boots
Alliance**

AUD#:	32002168
Report Date :	21 December 2020
Supplier :	Opal International Trading Limited
Factory :	Dongguan Xinguan Tin Packaging Mfg. Ltd.
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WALGREENS BOOTS ALLIANCE – ETHICAL SOURCING AUDIT

General Details

Supplier Name	Opal International Trading Limited							
Supplier Location	Blocks B and C 5/F Hoover Ind. Bldy 26-38 Kai Cheong Rd Kai Chung, Hong Kong.							
Factory Name	Dongguan Xinguan Tin Packaging Mfg. Ltd.							
Factory and Audit Location	No. 17 of Fulong Road, Jinlong Industrial Zone, Sanzhong, Qingxi, Dongguan, Guangdong, China							
Audit date	16 December 2020							
Audit Timings	Start Time	Finish Time	Opening Meeting	Factory Tour	Lunch	Worker Interview	Document Review	Closing Meeting
	08:59	17:54	15 mins	160 mins	30 mins	60 mins	250 mins	20 mins
Standard	Walgreens Boots Alliance Code of Conduct							
Type of audit	Annual Audit							
Was the audit announced?	Semi-unannounced							
Products currently or proposed to be supplied	Tin box							

Overall grading

Overall Results

Grade	Critical	Major	Minor	Total
Needs Improvement	0	5	2	7

- **Satisfactory: None or only minor issues or few non-compliances exist**
- **Needs Improvement: Significant non-compliances exist**
- **Critical: One or more critical issue(s) or numerous significant non-compliances exist**

Executive Summary

Dongguan Xinguan Tin Packaging Mfg. Ltd. was established in 2008, and located at No. 17 of Fulong Road, Jinlong Industrial Zone, Sanzhong, Qingxi, Dongguan, Guangdong, China. It occupies 6,105.8 square metres with one 3-storey building, one 2-storey building and one 1-storey building for office, production and warehouse, and one 4-storey building for dormitory, kitchen and canteen. Total number of employees is 106.

The factory specializes in production of tin box. As per the management interview they had received some social accountability audits from their clients or the third parties before. As per the management interview their main customers are overseas in America and Europe. Their main production processes are cutting, punching, assembly and packing, etc.

Factory management were cooperative in the process of audit and promised to improve as soon as possible.

Remark:

The accurate and right factory address should be "No. 17 of Fulong Road, Jinlong Industrial Zone, Sanzhong, Qingxi, Dongguan, Guangdong, China" which is little different from the one "Jinglong Ind Zone, Shanzhong, Qingxi, Dongguan, Guangdong, China" shown in booking form and the one "Longcheng Street, Fulong Road, Jinlong Industrial Zone, Qingxi, Dongguan, Guangdong, China" shown in business license. The factory representatives stated that they are same place.

Audited by		Checked by		Approved by	
Name	Iverson Lee	Name	Katharine Xu	Name	Harry Lin
Title	Senior Auditor	Title	Auditor Coordinator	Title	Senior Manager
Date	16 December 2020	Date	18 December 2020	Date	21 December 2020



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CORRECTIVE ACTION PLAN

	Finding Details (English)	Section #	Grade	Local Law / WBA CoC / TUV SUD Standard
1.	It was noted that no lockers were provided to the workers in 1 out of 3 randomly sampled dormitory rooms. (See image 35)	5.4	Minor	In accordance with Regulation on the Building Design of Dormitories (JGJ 36--2005), Article 4.2.3
2.	It was noted that no toilet paper and trash bins were provided to workers in the toilets of the dormitory building. (See image 36)	4.23	Major	Refer to WBA COC.
3.	It was noted that no safety labels were marked on two barrels of chemicals and only general labels instead of safety labels were marked on several barrels of chemicals in the chemical warehouse. (See image 37,38)	4.45	Major	Regulations on the Safe Use of Chemicals in the Workplace, Article 12.
4.	It was noted that one evacuation route in the punching workshop on the 1F of the 2-storey production building was partially blocked by some goods during working hours, but evacuation was not hindered by blockage. (See image 39)	4.40	Major	PRC Fire Protection Law (1998) Amendment (2009), Article 28
5.	It was noted that one worker in the punching workshop was not wearing the provided earplugs while working and two workers in the molds making workshop were not wearing the provided safety shoes while working. (See image 40,41)	4.18	Major	Production Safety Law of the People's Republic of China, Article 42.
6.	It was noted that no toilet paper and trash bins were provided to workers in the toilets of the 4-storey production building. (See image 42)	4.23	Minor	Refer to WBA COC.
7.	Through checking the attendance records of 5 randomly sampled workers from 01 November 2019 to the audit day, it was noted that the maximum monthly overtime hours were 82 hours in November 2019 and August 2020. (Remark: The maximum weekly working hours were 58 hours.)	2.7	Major	Article 41 of the Labor Law of the PRC.



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Factory Profile									
1.	Factory Name (Include all names)	Dongguan Xinguan Tin Packaging Mfg. Ltd.							
2.	Factory Address	No. 17 of Fulong Road, Jinlong Industrial Zone, Sanzhong, Qingxi, Dongguan, Guangdong, China							
3.	Any Other Factory Location (give address)	N/A							
4.	Factory History	Factory site opened			Company founded				
		02 April 2008			02 April 2008				
5.	Factory Owners	Name			Title				
		Ms. Zhong Jia Ling			Boss				
6.	Factory Representatives Present	Name			Title				
		Ms. Yin Huan Zhang Mr. Yang Rong Cai Mr. Fang Neng Wen Ms. Tang Hai Yan			Factory Manager Production Manager Workers Representative HR Clerk				
7.	TUV SUD/ WBA Staff Present	Name			Title				
		Iverson Lee			Senior Auditor				
8.	Products being produced on site	Tin box							
9.	Factory Area in Square Metres	6,105.8 square meters							
10.	No. of Buildings	4 buildings							
11.	Factory capability:	Main products			Monthly Capacity				
		Tin box			1200,000 pieces				
12.	Main manufacturing processes / Equipment / Machines	Key processes			Monthly Capacity				
		Cutting Punching Assembly Packing			1200,000 pieces 1200,000 pieces 1200,000 pieces 1200,000 pieces				
13.	Total Number of Employees	106							
14.	Breakdown of Employees	Executives		Administrative/ Clerical		Full-time Workers		Casual/ Contract	
		Male	Fem	Male	Fem	Male	Fem	Male	Fem
		7	0	4	3	58	34	0	0
15.	Breakdown of Nationality of Workers	Nationality		Male	Female	Nationality		Male	Female
		Chinese		11	3	Chinese		58	34
16.	Does the factory provide accommodation to workers? (How many rooms)	Yes, 21 rooms in total.							
17.	Does the accommodation belong to factory or is it rented?	It was rented.							
18.	What accreditations does the factory have?	No accreditation.							
19.	Does the factory have independent quality department with designated quality manager, which is not under control of the production department?	Yes, Mr. Zhong Wei (QA Supervisor), who is in charge of the independent quality department, and it is not under control of production department.							
20.	How many full time quality assurance employees are available?	Total 1 full-time quality assurance employee.							



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1. Terms and Conditions

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	There shall not employ any indentured, forced or convict labor. There must be no prison, slavery and human trafficking.	X				W,O
2.	No workers shall be required to lodge deposit or identity papers with their employer.	X				W
3.	Any worker shall be free to leave their employer after a reasonable notice.	X				M, W
4.	Any worker shall be entitled to a reasonable period of notice in the event of termination.	X				M, W
5.	Workers must be provided with written and understandable information about their conditions of employment, including rates of pay. There should be no illegal/unreasonable terms in contract.	X				M, W
6.	Any probationary period referenced in factory and employment documentation shall comply with all applicable laws and regulations	X				
7.	Promised terms do not meet actual terms: The actual terms are in compliance with law but the employee is in a vulnerable state (cannot pay back loans/ debts as planned, cannot provide for his/her family, is forced to stay in employment longer than expected)	X				
8.	One or more employees in severe debt (debt bondage, peonage) due to recruitment or employment (equal to or above 1 month salary) (with or without proof of documentation)	X				
9.	What is the period of notice required by local law and by the worker's employment contract?				30 days' notice in advance.	M, D
10.	Workers must not be subject to bullying, physical or verbal abuse or the threat of such.	X				W, O
11.	Workers must not be subjected to harassment (sexual or other) nor must they be subjected to other forms of intimidation. There must be no unreasonable search. i.e. no gender-appropriate body search, no strip search.	X				W
12.	Disciplinary processes must be clearly defined as per local law and communicated to all workers. All disciplinary action must be recorded.	X				D, W
13.	Describe the disciplinary processes used by the factory.				Warning, minor mistake record, major mistake record and dismissal.	M



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14.	Grievance procedure must allow for all workers to raise concerns with their employer about their employment conditions or about other employees without reprisal.	X				M, W
15.	These processes must be clearly defined and communicated to all workers.	X				M
16.	Describe the processes that exist for workers to raise concerns with their employer.				Through suggestion box or report to team leader/supervisor/workers representatives directly.	M
17.	All workers must be entitled to join a trade union of their own choosing (subject to local law).	X				M
18.	All workers shall be entitled to bargain collectively (subject to local law).	X				M
19.	The factory must demonstrate an open attitude towards trade unions and their organisation activities. (subject to local law).	X				M
20.	Workers representatives must be allowed access to the workplace to carry out their functions and must not be discriminated against. (Subject to local law).	X			No union in the factory and 5 worker representatives voted by the workers in the factory.	M
21.	Workers can join a trade union and associate or bargain collectively without penalizing, discrimination, harassment.	X				M
22.	To every extent possible work performed must be on the basis of a recognized employment relationship established through national law and practice.	X				M, D, W
23.	Part-time, temporary, fixed-term contracts or home-working arrangements shall not be used to avoid compliance with this code or to avoid obligations to employees under local labor law and practice. This includes workers supplied through agencies.			X	No such workers.	M, W
24.	Employment Agency must only supply workers registered with them. Documents shall be provided to demonstrate the contractual relationship between the agency and the workers.			X	No Employment Agency was used by the factory.	
25.	Workers shall not be placed under duress to sign their agreement to terms and conditions (or changes).	X				W
26.	There must be no discrimination during recruitment or employment based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, ethnic origin or political affiliation.	X				W
27.	There shall be no employment term that specifies that employees can be confined or be subjected to unreasonable restrictions on freedom of movement	X				



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28.	Females are not required to have pregnancy tests or pregnancy prevention as a condition for hiring or continued employment.	X				D,M,W
29.	Pregnant women are not engaged in work that creates a risk for their pregnancy or reproductive health.	X				O

2. Working Hours, Wages and Benefits

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1	Workers shall not on a regular basis be required to work in excess of 48 hours per week.	X				D, W
2	Where required by law, time cards or other accurate and reliable recording systems such as electronic swipe cards shall document time worked by employees.	X				
3	How many hours does a worker do per week on average in this factory?				About 55 hours per week on average.	D, W
4	All workers must be allowed at least a 24-hour rest period every 7-day period, or 2 days off in 14.	X			At least a 24-hour rest period per week on Sunday.	
5	How many days off per month does a worker have on average in this factory?				4~5 days off per month on average.	D, W
6	Worker participation in overtime shall be entirely voluntary.	X				W
7	What is the average overtime per month in this factory?				Through checking the attendance records of 5 randomly sampled workers from 01 November 2019 to the audit day, it was noted that the maximum monthly overtime hours were 82 hours in November 2019 and August 2020. (Remark: The maximum weekly working hours were 58 hours.)	D, W
8	Wages and benefits for basic hours must meet local legal minimum criteria or local norms for industry whichever is the higher.	X			Please refer to #2.14.	M, D, W
9	Wages and benefits for basic hours must allow at least enough for the provision of basic needs and some discretionary income.	X			Please refer to #2.14.	
10	The employees are properly paid during downtime period.	X				
11	Lacking legally-mandated social security/welfare benefits for employees	X			The facility provided recent 3 months' social insurance receipts for audit, the social insurance receipt of December 2020 (the most recent social insurance coverage month) showed there were total 106 employees in this month, the facility purchased injury insurance, retirement insurance, unemployment insurance, medical insurance and maternity insurance for all employees, so only 100% of workers are covered with all 5 types of insurances.	M, W
12	Employees shall be provided annual leave and holidays as required by law.	X				
13	What is the local legal minimum wage?				RMB1,720 per month since 01 July 2018.	M



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14	What is the minimum wage received by the workers in this factory?				Based on payrolls review and workers interview, workers were paid by the hour, the minimum wage in the factory was RMB1,920 per month/RMB88.28 per day which was higher than local legal requirement.	M, W
15	What is the overtime pay scale?				Based on documents review and workers interview, workers were paid 150% of basic wage for overtime on weekday, 200% of basic wage for overtime on weekend and 300% of basic wage for overtime on legal holiday. Workers didn't work on legal holidays till now but 300% of basic wage for overtime on legal holidays would be paid if workers worked on legal holidays as per the documents review and workers interview.	M, W
16	All workers employed through the Agency shall comply with local labor laws & regulations applied to them (e.g. minimum wage, working hours).				N/A. No worker was employed through the Agency.	
17	All workers shall be paid in timely manner and provided with written, understandable information (pay-slip) relating to their wages for each pay period.	X				D, W
18	Deductions from wages as a disciplinary measure shall not be permitted.	X				W
19	Where a charge or deduction is made for accommodation, transport, meals or similar benefit which is provided, this deduction shall not be excessive.	X				M, D
20	Deductions from wages not provided for by national law shall not be permitted without expressed permission of the worker concerned.	X				W
21	All deductions shall be clearly indicated on workers' pay-slips.	X				D

3. Age

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Children shall not be employed. (A child is any person under age 15 or under age 14 in developing countries or any higher minimum age under local law for leaving school and starting work). Inconsistent, falsified, manipulated, incomplete or insufficient documents causing age not able to be identified	X				D, W
2.	Age document for all employees should be kept on file.	X				
3.	What is the minimum age for starting work according to local law?				16 years old.	D, M
4.	What age is the youngest worker in the factory?				20 years old.	D, M



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5.	A young person shall not be employed at night or in hazardous circumstances. (A young person is any worker who is no longer a child but who is under the age of 18).			X	No young worker was found in the factory.	M, W
6.	The education, health, physical, mental, spiritual, moral or social development of a young person must not be adversely impacted by the work he or she performs, the number of hours worked or the conditions of work.			X		M, W
7.	Health examination not provided to young workers; No registration with local labor bureau, regular medical check at expense of facility etc. for young workers.			X		
8.	Factory shall develop policies and procedures which prevent the hiring of child labor and provide for the transition of any child found to be performing child labor to enable her or him to attend and remain in quality education until no longer a child	X				

4. Health and Safety						
No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Responsibility for the implementation of Health and Safety shall be assigned to a senior manager.	X				M, D
2.	What is the name of this Manager and who does he/ she report to?				Mr. Yang Rong Cai reports to Mr. Yin Huan Zhang (Factory Manager).	M, D
3.	Working Conditions for all employees shall be safe and hygienic.		X		Some health and safety risks were found during the audit. Details please refer to below comments.	O, W
4.	Machines are equipped with necessary safety devices and adequately maintained with maintenance records available.	X				O
5.	Is training provided to the employees who operate the machinery with regards to the safe use and handling of the machinery.	X				D.W
6.	Where required by law, employees working in hazardous working environment shall be subject to annual health examination.	X				D.W
7.	Childcare facilities, if any, shall not physically overlap with production areas and children shall not have access to production areas i.e. worker's children found on production floor.			X	There were no Childcare facilities in the factory.	O
8.	Emergency procedures must be in place and their efficiency evaluated at an appropriate frequency.	X				O



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9.	Are fire drill (or risk assessment or health and safety training) regularly conducted at an appropriate frequency? a. At least once per year b. Include production area Include dormitory when most of the workers there (e.g. after finish work/ early evening) d. Relevant records shall be kept of the date / time and participants accurately	X			Fire drill was conducted twice per year. Provided records showed that the latest joint fire drill was conducted on 19 June 2020 in both dormitory and production areas.	M, W
10.	Are there serious accidents (including fires) with fatalities or multiple injuries?	X			There were no serious accidents (including fires) with fatalities or multiple injuries.	M,W,O
11.	Confirmed fire at facility resulting in structural damage to building, employee injury that required advanced medical attention/hospitalization or, deployment of local fire company/brigade.	X				
12.	Risk assessment/ management shall be used as a proactive approach to accident prevention. A review of all risks in relation to health and safety shall be carried out on a regular and appropriate basis.	X				M, D
13.	All accidents are suitably recorded with details of the incidents and actions.	X				D
14.	Adequate steps shall be taken to minimize the causes of hazards in the working environment.		X		Refer to context.	O
15.	Workers shall receive health and safety training which is refreshed on a regular basis. Training records are documented on file.	X				M, W, D
16.	Workers shall not be assigned to any task for which they have not received the appropriate training.	X				M, W, D
17.	Personal Protective Equipment (where relevant) is provided for all workers.	X				O
18.	Is Personal Protective Equipment worn by the workers at all times?		X		It was noted that one worker in the punching workshop was not wearing the provided earplugs while working and two workers in the molds making workshop were not wearing the provided safety shoes while working. (See image 40,41)	O
19.	Is there evidence that management actively encourages the use of PPE?	X				O, M
20.	Sufficient First Aid boxes are available in all locations.	X				O
21.	What is the ratio of staff trained for First Aid and how are they identified?				2 out of 106 employees were trained in first aid and the ratio was 2%. Their photos, names and contacts were posted on the first aid boxes throughout the factory.	M
22.	Is the contact information of the staff trained for First Aid posted in a noticeable location at each floor?	X				O



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23.	Clean toilet facilities must be accessible to all workers.		X		It was noted that no toilet paper and trash bins were provided to workers in the toilets of the 4-storey production building. (See image 42) It was noted that no toilet paper and trash bins were provided to workers in the toilets of the dormitory building. (See image 36)	O
24.	What is the ratio of toilets per workers?				For male: 1:6 For female: 1:11	M, O
25.	How often are the toilets cleaned per day?				Twice per day.	M, D
26.	Potable drinking water must be accessible to all workers. Valid quality test report of the water is obtained.	X				O
27.	As dictated by local law, a building permit must be obtained covering all the construction buildings in use.	X				D
28.	Are there any newly erected or expanded buildings? If yes, are they covered under a building permit?			X	No newly erected or expanded buildings in the factory.	M, W, D
29.	Are there any signs of unsafe building conditions, e.g. cracks or leaks found on walls? If there are, are those buildings assessed by an independent and qualified 3 rd party? Please give out the assessment result by the 3 rd party.	X			Through factory tour, all buildings were maintained in good condition, no cracks or leaks were found.	O
30.	No or missing or expired legally required H&S permits/ licenses/ certifications for the relevant safety facilitates (e.g. forklift).	X				O,D
31.	All factory and accommodation areas must have sufficient emergency exits, escape routes.	X				O
32.	Are fire extinguishers sufficiently provided, mounted to walls and/or columns and be easily accessible in all areas? (It shall NOT be put on floor directly.)	X				O
33.	Are Fire Extinguishers maintained and checked for function regularly?	X				O,D
34.	Do the employees know the proper use of fire extinguishers? Any Operating instructions shall be placed, in the local language, near or on the fire extinguishers?	X				D,W
35.	Are "Fire extinguishers" signs posted in the local language(s) above each fire extinguisher to ensure that its location can be easily seen from a distance?	X				O
36.	Fire extinguishers shall be appropriate to the types of potential fires in the various areas of the dormitory and labelled according to the types of fire they are to be used for.	X				O.
37.	Are fire hydrants or fire sprinklers installed as per legal requirements?	X				O,D
38.	Where applicable, are fire hydrants or fire sprinklers inspected by factory regularly?	X				D



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39.	Is firefighting equipment like fire extinguisher, fire hydrant inspected by outside company with qualification annually?	X				D
40.	All escape routes, aisles, staircase and exits shall be clearly marked, suitably illuminated, kept clear and remain unlocked always. (Auditor should remark evacuation is (not) hindered by blockage)		X		It was noted that one evacuation route in the punching workshop on the 1F of the 2-storey production building was partially blocked by some goods during working hours, but evacuation was not hindered by blockage. (See image 39)	O
41.	Doors and corridors that could be mistaken for emergency exits shall be properly marked in the local language(s) (for example: "Not An Exit," "To Basement" or "Storeroom").	X				O
42.	Space between each workstation or Width of aisles and exits shall allow adequate room for emergency evacuation.	X				O
43.	Is the Chemicals Management adequate? Is there a separate chemical warehouse for storage of hazardous chemicals and a chemical management system in place?	X				O
44.	Material Safety Data Sheets (MSDS) or equivalent shall be readily available to all employees in the area of use and storage in the local language.	X				O
45.	Does Chemical labelled properly with its identity and warning label?		X		It was noted that no safety labels were marked on two barrels of chemicals and only general labels instead of safety labels were marked on several barrels of chemicals in the chemical warehouse. (See image 37,38)	O
46.	Chemicals stored in an area with lacking ventilation, and/or lacking secondary containment as required by the MSDS and/or for chemicals stored in tanks or other large containers.	X				D.O
47.	Chemicals shall not be stored in dangerous environment.	X				O
48.	"No Smoking" signs in the relevant language(s) shall be posted in areas where "FLAMMABLE" chemicals are stored.	X				O
49.	Is there designated smoking area at the company?	X				O
50.	Are all electrical installations safe and checked regularly by competent person?	X				O
51.	Electric cords shall be in good condition, continuous in length without splices or taped repairs. Electrical panels with circuit breakers shall be installed, labelled and maintained in good condition.	X				O
52.	Does company obtain fire safety documentation for the used buildings?	X				D



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53.	Are evacuation plans containing "You Are Here" mark and indication of firefighting equipment available illuminate on each floor?	X				O
54.	Missing some fire extinguishers and/or other firefighting equipment	X				O
55.	Are evacuation directional sign for the evacuation paths and staircases installed at proper height and luminescent or with light box?	X				O
56.	Are emergency exit doors open in the direction of travel to facilitate evacuation as per legal requirement? If rolling door or sliding door is used, is there mechanism to ensure the door is secured in fully open position during working hours ?	X				O
57.	Are fire alarms adequately installed at the company?	X				O
58.	Are fire alarms connected to a secondary power source?	X				O
59.	Where applicable, are fire alarm audible on every floor or section of production building /dormitory. e.g. Fire alarms with beacon lighting installed at high noise environment?	X				O,W
60.	Do employees know the location and purpose of the alarm button?	X			Known from worker interview, all sampled workers clearly knew about the location and purpose of the alarm button.	W
61.	Fire alarm shall be separate / distinctive from any other alarm system (i.e. lunch bell).	X				O
62.	Fire alarm system shall be installed to be activated from the factory or dormitory by means of a pull box or push button.	X				O
63.	There shall be appropriate ventilation in all production areas, especially where continuous lifting of heavy objects is done, or where heat / fumes is generated.	X				O
64.	Is there designated assembly point in reasonably safe place? (i.e. away from the building, public road, etc.)	X				O
65.	Unreasonably limited access to basic needs (i.e. food, water, toilet, etc.)	X				
66.	Provision for the hygienic supply, storage and consumption of food shall be made.	X				M, O
67.	Canteen operating licenses and food personnel exams must be obtained by local health authority and maintained on site as required by local law.	X				D,O
68.	Does company conduct internal inspection for health and safety on regular basis?	X				D,M,W



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5. Living Conditions - Dormitories

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Where accommodation is provided, this must be safe, hygienic and not compromise the dignity of the workers.	X				O, W
2.	Is the dormitory building separate from the production and warehouse buildings?	X				O, D
3.	Is the dormitory segregated by gender?	X				M, W, O
4.	Is there an appropriate number of people and space in each dormitory room?	X				O, D, M
5.	Is the general condition of the dormitory hygienic and not compromise the dignity of workers? a. Each employee is provided a secure locker. b. Adequate ventilation is provided. c. Lights are installed to ensure uniform lighting. d. Dormitory is cleaned on a regular basis. e. Smoking is not permitted in non-smoking area. f. Cooking is permitted only if authorized by the factory and the room is safely equipped.		X		It was noted that no lockers were provided to the workers in 1 out of 3 randomly sampled dormitory rooms. (See image 35)	O
6.	Is the general condition of the dormitory safe? a. Each dormitory building has at least two exit routes. b. Evacuation routes are defined and not blocked.	X				O
7.	Describe the recreation areas to employees?				TV in canteen.	O
8.	Are showering facilities located on the dormitory? a. Adequate number of showers b. Showers are equipped with hot water taps in each floor when showering facilities available in each floor, in cooler climates. c. The toilets and showers shall be accessible to employees without unrealistic restrictions.				Yes.	O



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9.	Are the showering facilities clean and safe? a. Showers are cleaned on a regular basis. b. Floors are not slippery. c. Uniform lighting is provided. d. Adequate ventilation is provided. e. Showering facilities are equipped with door to provide privacy.	X				O, M
10.	Are there an adequate number of toilets and sinks in the dormitory?	X				O
11.	Are the dormitory toilets and toilet facilities clean and safe? a. Toilets are equipped with an effective water flushing system. b. Toilets and toilet facilities are clean, maintained, and functional. c. Floors are not slippery. d. Uniform lighting is provided. e. Adequate ventilation is provided. f. Trash bins are provided. g. Toilets are equipped door and locks to ensure privacy.	X				O, M
12.	Is appropriate security provided at the dormitory area? a. Gates and doors that are not used as emergency exits are locked for security purposes. The dormitory doors are self-locking	X				
13.	Is not excessive restriction on movement for dormitory? a. Dormitory has 24 hours access b. Workers are free to come and go in non working hours	X				O

6. Environment

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Suppliers must comply with the local environmental legislation as a minimum.	X				M, D
2.	Suppliers must document their own environmental aims in a written policy statement.	X				D
3.	Responsibility for the implementation of environmental policy shall be assigned to a senior manager.	X				M
4.	What is the name of that senior manager and who does he/she report to?				Ms. Tang Hai Yan reports to Mr. Yin Huan Zhang (Factory Manager).	M



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5.	What evidence of environmental activity can be seen in the course of the audit? (in relation to sustainable development, optimum use of raw materials, efficient use of energy, safe-guarding of biodiversity and the minimization of adverse impacts arising from the disposal of products)				No evidence.	O
6.	Are there Environmental incidents with significant impact on environment?	X			No such Environmental incidents happened based on documents review and workers interview.	
7.	Waste management shall comply with all applicable laws and regulations	X				O

7. Supplier / Subcontractor Management

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Are subcontractors used by the company?				No.	
2.	If yes, is there written evidence which indicate that client is informed the use of the subcontractors?				N/A. No subcontractor was used.	
3.	Does the factory have available system and procedures to select and manage the subcontractors?			X		
4.	Are suppliers/ subcontractors systematically assessed and ongoing assessment records kept? The assessment for the suppliers/sub-contractors is involved ethics which should include (but not limited) child labor, minimum wages, etc.	X			The factory had established the procedures to assess and manage the performance of social accountability of their suppliers, the provided records showed the assessment for the suppliers was involved ethics which includes (but not limited) child labor, minimum wages, etc.	

8. Management

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Valid business license for the assessed factory and any other business 'renting' out areas of the building if owned by the factory are available for review.	X				M,O
2.	The auditor is granted access to any area of the factory that WBA or its authorized designee deems necessary to verify compliance with these standards i.e. deny access to document review, factory tour or worker interview etc.	X				M,O
4.	Describe the overall management style of the factory?				Open and cooperative.	
5.	Overall, is the factory management positive towards continuous improvement and the results of this audit?	X				M



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9. Right of Inspection

No.	Description	Grading			Remarks	Code
		C	NC	NA		
1.	Denied access for the entire audit	X			No such evidence.	D.M
2	All documentation and records provided during the audit process shall be complete, consistent and not falsified. Rest day(s) / overtime hours / minimum wage / overtime remuneration could not be fully verified due to the incomplete, inconsistent or falsified documents	X			No such evidence.	
3.	Factory fails to provide factory / production records / contract and any relevant documentation.	X			No such evidence.	D.
4.	Worker interviews not permitted.	X			No such evidence.	O
5.	Inducement or reward offered, promised or provided to auditor.	X			No such evidence.	

Notes

Each individual question is evaluated as one of the following:

- C** – Fully compliant
- NC** – Nil compliance or very poor
- NA** – Not applicable

The Code in the final column refers to the method of gathering or cross-referencing objective evidence:

- D – Documentary Verification
- M – Management interview
- O – Observation during factory tour
- W – Worker interview

Methodology of the Audit

The audit results presented in this report were based upon samples of records, which were available at the time of request, observations and interviews of both managers and workers. TUV SUD Asia cannot be held responsible for report omissions. This report should not be held by the audited company or the client to represent endorsement of any action undertaken by the audited company, which may not meet the requirements of the Laws of the country where the audit has been carried out. TUV SUD conducts all audits according to the highest professional standards, based on ISO 19011. However, it must be reminded that each audit is based on a sampling approach. Therefore, there may be issues, which have not been discovered in the course of the audit. It is the responsibility of the auditee to identify those issues through its own monitoring process. The above reflects our findings for the particular factory in concern on the date of our service only. The report does not certify, confirm or imply: a) Compliance with any government, industry or association regulations or standards, unless stated otherwise; or b) the quality of any specific products manufactured by the factory/sellers/suppliers; or c) the shipment of any specific products. This report does not discharge or release the factory/sellers/suppliers from their commercial, legal or contractual obligations with buyers in respect of products manufactured by the factory/sellers/suppliers. Our services, including reports and certificates are subject to the general conditions of TUV SUD Asia, which have been sent to your company. They can be resent upon written request. This report cannot be partially copied. Any reader other than the party for which this report has been specifically issued is hereby informed that the General Conditions of Service of TUV SUD Asia contain liability limitation provisions



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AVAILABLE DOCUMENTS LIST

(Detach during opening meeting. Factory to provide 1 copy of each document for verification unless otherwise noted)

No	Document	Yes	No	N/A	Remarks / Comments
1.	Legal Registration document	X			
2.	Local Labour Law	X			
3.	Customer's Code of Conduct Document	X			
4.	Employment Contracts (5 copies)	X			
5.	Personnel Files (5 copies)	X			
6.	Training Records (5 copies)	X			
7.	Time Cards (20 copies)	X			
8.	Days-Off/ Leave Records (5 copies)	X			
9.	Pay-Slips (5 copies)	X			
10.	Record of ID cards showing Proof of Age	X			
11.	Organisation Chart	X			
12.	Factory Lay-out plan	X			
13.	Accident Record	X			
14.	Fire Extinguisher Maintenance record	X			
15.	Health & Safety Certificates	X			
16.	Risk Assessment/ Internal Audit Records	X			
17.	Environmental Policy	X			
18.	Local Environmental Law	X			
19.	Sub-contractor Audit Reports			X	No subcontractor used by the factory.
20.	Material Safety Data Sheets (MSDS)	X			
21.	Equipment maintenance record	X			
22.	Security Breach procedure			X	
23.	Security Guard Contract	X			



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Digital Images



Image 1: Factory overview.



Image 2: Factory name.



Image 3: Street No. of factory address.



Image 4: Incoming materials warehouse.



Image 5: Cutting workshop.



Image 6: Punching workshop.



Image 7: Assembly and packing workshop.



Image 8: Finished products warehouse.



Image 9: Emergency lights and exit signs were installed above all fire exits.



Image 10: All 2 randomly sampled emergency lights were functional when being tested.



Image 11: Fire hydrants and fire alarms were fully installed.

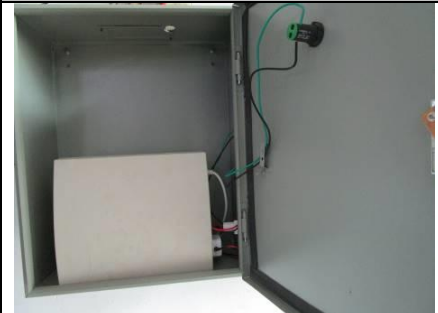


Image 12: Fire alarms were connected to a secondary power source.



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Image 13: Fire extinguishers were fully installed.

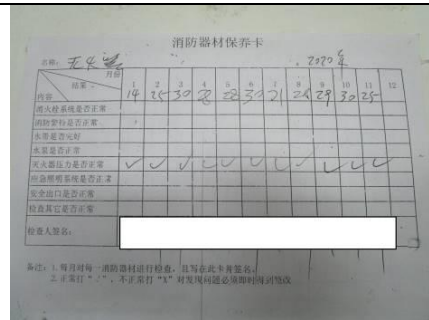


Image 14: Monthly inspection records for the firefighting equipment.



Image 15: Evacuation directional signs.



Image 16: Posted fire evacuation plan.



Image 17: Emergency assembly area.



Image 18: Posted "No Smoking" sign.



Image 19: First aid boxes were fully stocked.

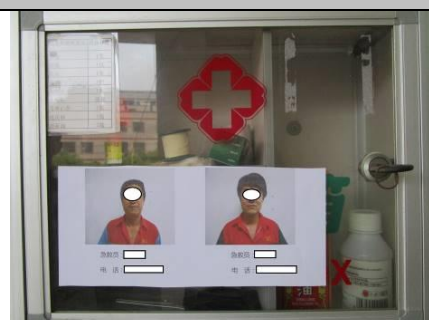


Image 20: First aiders were visibly identified.



Image 21: Warning sign for PPE wearing.



Image 22: Proper PPE was provided to the workers.



Image 23: Safety guards were installed for all machines.



Image 24: Suggestion box.



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Image 25: Electronic attendance system.



Image 26: Safety labels were posted on individual chemical containers.



Image 27: Eye washers were available and functional.



Image 28: Dormitory room.



Image 29: Lockers were provided in the dormitory rooms.



Image 30: Canteen.



Image 31: TV room.



Image 32: Potable water.

CORRECTIVE ACTION PLAN			
Overall Grade	Summary	Findings	Corrective Action
1	It was noted that no notice was provided for the workers to use the newly installed dormitory rooms.	It was noted that no notice was provided for the workers to use the newly installed dormitory rooms.	It was noted that no notice was provided for the workers to use the newly installed dormitory rooms.
2	It was noted that the safety labels were not provided to workers in the factory.	It was noted that the safety labels were not provided to workers in the factory.	It was noted that the safety labels were not provided to workers in the factory.
3	It was noted that the maximum number of workers in the dormitory rooms was not limited.	It was noted that the maximum number of workers in the dormitory rooms was not limited.	It was noted that the maximum number of workers in the dormitory rooms was not limited.
4	It was noted that the maximum number of workers in the dormitory rooms was not limited.	It was noted that the maximum number of workers in the dormitory rooms was not limited.	It was noted that the maximum number of workers in the dormitory rooms was not limited.

Image 33: Signed CAP (page 1/2).

1. It was noted that one worker in the parking building was not wearing the provided safety vest while working and two workers in the workshop were not wearing the provided safety shoes while working.	1. 发现一名工人在停车场工作时没有穿提供的安全背心，两名工人在车间工作时没有穿提供的安全鞋。	Production Safety Law of the People's Republic of China, Article 42
2. It was noted that no toilet paper and bins were provided to workers in the factory.	2. 发现工厂没有为工人提供厕所纸和垃圾桶。	Refer to WBA COC
3. It was noted that the maximum number of workers in the dormitory rooms was not limited.	3. 发现宿舍楼的工人数量没有受到限制。	Refer to WBA COC
4. It was noted that the maximum number of workers in the dormitory rooms was not limited.	4. 发现宿舍楼的工人数量没有受到限制。	Refer to WBA COC

Signature: 李连生 Date: 2020.12.16

Image 34: Signed CAP (page 2/2).



Image 35: No lockers were provided to the workers in 1 out of 3 randomly sampled dormitory rooms.



Image 36: No toilet paper and trash bins were provided to workers in the toilets of the dormitory building.



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Image 37: No safety labels were marked on two barrels of chemicals.

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品名 Article	单号 OrderNo.	供应商 Supplier	
规格 Spec	数量 Quantity	日期 Date	颜色 Colors
作业员 Cutter	品管 Q.C	日期 Date	检验结果 Result of inspection

Image 38: Only general labels instead of safety labels were marked on several barrels of chemicals in the chemical warehouse.



Image 39: One evacuation route in the punching workshop on the 1F of the 2-storey production building was partially blocked by some goods during working hours.



Image 40: One worker in the punching workshop was not wearing the provided earplugs while working.



Image 41: Two workers in the molds making workshop were not wearing the provided safety shoes while working.



Image 42: No toilet paper and trash bins were provided to workers in the toilets of the 4-storey production building.