

Monitored Party Shantou LeListen Technology Co., Ltd.	amfori ID 156-058988-000	Address Address one: 801 of Phase II, Hougou Industry Zone, Gurao Town, Chaoyang District Address two: 1F of No. 1, South Area of Xinlou, Hougou Village, Gurao Town, Chaoyang District, 515159 Shantou, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 27/11/2024	Closing Meeting Finished Date 27/11/2024	Submission Date 02/12/2024
Expiration Date 02/12/2025	Announcement Type Semi Announced	
Site Shantou LeListen Technology Co., Ltd.	Site amfori ID 156-058988-001	

This is an extract of the online Monitoring Result, generated on 02/12/2024, and is only valid as an acknowledgement of the result. To see all the details, review the full monitoring result, which is available on the [amfori Sustainability Platform](#) - The English version is the legally binding one.

amfori does not assume any liability with regard to the compliance of this extract, or any versions of this extract, with the Regulation (EU) 2016/679 (General Data Protection Regulation).

All rights reserved. No part of this publication may be reproduced, translated, stored in a retrieval system, or transmitted, in any form or by any means electronic, mechanical, photocopying, recording or otherwise, be lent, re-sold, hired out or otherwise circulated without the amfori consent.© amfori, 2021

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	B	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Alex Zhang, APSCA membership number: CSCA 21701868

Monitoring partner name: TUV Rheinland

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

Announcement Type: It was a Semi-Announced audit.

Business partner information: The auditee was established in April 2023 and located at located at two addresses: Address one: 801 of Phase II, Hougou Industry Zone, Gurao Town, Chaoyang District, Shantou, Guangdong Province (地址一：广东省汕头市潮阳区谷饶镇后沟工业园区厂房第二期801). Address two: 1F of No. 1, South Area of Xinlou, Hougou Village, Gurao Town, Chaoyang District, Shantou, Guangdong Province (地址二：广东省汕头市潮阳区谷饶镇后沟村新楼南区1号1楼). The distance between those two addresses were about 500 meters, the auditor visited both sites during the audit period. The factory site of address one was used as office, warehouse, assembly and packing workshop, the address two was injection molding workshop. The auditee had moved from old site “101 of No. 2, Second Lane for North Area of Shunxing, Wujiao, Gurao Twon, Chaoyang District, Shantou City, 汕头市潮阳区谷饶镇乌窖顺兴北区二巷2号101” to current site “801 of Phase II, Hougou Industry Zone, Gurao Town, Chaoyang District, Shantou, Guangdong Province, 广东省汕头市潮阳区谷饶镇后沟工业园区厂房第二期801” since June 2024. During the audit period, auditor visited the old site which was about 1 km away from the current site of the factory, it was noted that the factory building of the old site was idle now, the auditee was no longer running business at the old site area. The facility mainly produced Bluetooth earphone with the main production processes of injection molding, soldering, assembly, testing and packing processes, no producing process was subcontracted to outsource.

Audited location information: For the factory address one, there were seven buildings in the industrial park. The auditee rented the two-thirds of the 8F for one 11-storey production building with about 2100 square meters and used those building area as warehouse, office, assembly and packing workshop, there was no canteen or dormitory provided by the auditee. The rest other area of the 8F was rented by a garment factory and used as warehouse and production workshop. The 7F was rented by a cup moulding factory and used as warehouse and production workshop. The 2F was rented and used by a plastic products factory. The rest other floors of the 11-storey production building were used by the landlord, which manufactured at cotton dress. There was physical isolation to separate between each other. The rest other buildings were used by several factories and the landlord, there was no further information about the other factories in the park. There was no common management or business relationship between each other.

For the factory address two, there was one 5-storey building. The auditee rented the 1F for the 5-storey production building with about 300 square meters and used those building area as injection molding workshop, there was no canteen or dormitory provided by the auditee. The rest other floors of the 5-storey building were used as warehouse by the landlord.

According to onsite tour, management interview and workers interview to confirm that, there was no share working area or share work force between the auditee and other factories in the same building, therefore, this audit only covered the auditee area.

Operating shifts and hours: Normal working hour was 5 days and 40 hours per week. Workers had one shift of working time as: 08:30-12:00, 13:30-18:00, overtime working started from 18:30 to 20:30. Attendance records from 1 November 2023 to 27 November 2024 of 10 workers were reviewed randomly. Maximum 2 hours overtime per day, maximum 18 hours overtime working per week and maximum 84 hours overtime per month, and at least one day off after 6 days consecutive working days was guaranteed. No obvious low or high season was in the auditee for last 12 months.

Time recording system: Finger print attendance machines were used to record the time in/out.

Salary payment details: The local minimum wage standard was set at RMB 1720 per month since 1 December 2021 (equal to RMB 9.89 per hour). Workers were paid in cash around the 20th of each month and the latest payment month was October 2024. Sampling 10 workers' payrolls from November 2023 to October 2024 showed that workers were paid with the minimum monthly rate of RMB 1800, which was higher than the local minimum wage standards. Workers were

paid at 150%, 200% and 300% of the regular wages for the overtime conducted in the regular days, rest days and statutory holidays.

Worker number information:

- 48 employees in total, including 34 production workers and 14 non-production workers.
- 34 production workers, including 25 male workers and 9 female workers.
- 30 domestic migrant workers, including 21 male workers and 9 female workers. There was no foreign migrant, young, pregnant, seasonal, temporary, disabled, home-based workers.
- There were no interns, apprentices, contractor workers.

Good practices: Nil.

Worker organization details: There was one worker representative in the factory who was elected in January 2024. There was no other worker organization.

Circumstances: The management staff were open and cooperative during the audit. There was no special circumstance during the audit.

Summary of findings: Findings were detected in PA1, PA5, PA6, PA7, PA12

PA1: Incomplete management system implementation and production capacity planning

PA5: Insufficient social insurance

PA6: Excessive monthly overtime

PA7 No occupational diseases examination was provided to workers. Some employees did not participate in work injury insurance. No local exhausting ventilation was installed for the soldering position. The factory did not provide the construction finished acceptance report and fire acceptance reports of one 5-storey building for review.

PA12: The factory did not provide Environmental impact Assessment (EIA) report and EIA approval for review. The factory could not provide the Monitoring Report of the Environmental Protection Checking and Accepting or the Approval of the Environmental Protection Checking and Accepting. The factory did not conduct online registration for the document of Pollutant Discharge for Stationary Pollution Sources.

#Living wage calculation:

1. No ANKER wage was available for the producer's location, therefore the auditors used the data provided by auditing company.
2. The calculation methodology refers to ANKER living wage structure.
3. The data comes from the local bureau of statistics for the current year.

Attachments:

1. There was no government waiver on social insurance and overtime in the factory. There was no collective bargaining in the factory. No labor contractor, agency, etc. was used in the factory. Therefore, these documents were not applicable to attach to the report.
2. The Personal Information Protection Law of the People's Republic of China was effective as of November 1, 2021. The producer signed the "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 had been obtained the individual's consent during the audit.

SITE DETAILS

Site

Shantou LeListen Technology Co., Ltd.

Site amfori ID

156-058988-001

GICS Classification

Sector	Industry Group	Industry
Consumer Discretionary	Consumer Durables & Apparel	Household Durables
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	48	Workers
Legal minimum wage in local currency	1,720	Monthly
Lowest wage paid for regular work at the site	1,800	Monthly
Calculated living wage in local currency	1,926.53	Monthly
Total sample	10	Workers

Other Metrics

Male workers	34	Workers
Female workers	14	Workers
Non-binary workers	0	Workers
Permanent workers - Male	34	Workers
Permanent workers - Female	14	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	21	Workers
Domestic migrant workers - Female	9	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	34	Workers
Workers hired directly - Female	14	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	7	Workers
Sample - Female	3	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: Shantou LeListen Technology Co., Ltd. | Site amfori ID: 156-058988-001

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 the principle, according to document review, onsite tour, management interview and workers interview to confirm that, the factory established the social compliance management manual and procedures based on amfori BSCI principle and local legal requirement. For example, the working hours control procedure, wages and benefit management procedure and occupational health and safety management procedure. However, the auditee did not respect and monitor the effectiveness of management system. For example, social insurances did not cover to all employees, the monthly overtime hours exceeded 36 hours, etc. According to management interview to know that, the factory did not follow the requirement of amfori BSCI to establish effective correct action to improve the issues. It violated the requirements in the amfori BSCI system manual.	被审核方部分遵守该原则，通过文件查阅，现场审核，管理层和员工访谈确认，工厂建立了基于amfori BSCI原则和当地法律法规的社会责任管理手册和程序文件。例如，工作时间控制程序，工资福利程序和职业健康与安全管理程序。然而，被审核方未充分尊重和监控管理体系的有效性。例如：社保未全员覆盖，月加班时间超过36小时等。通过访谈管理层得知，工厂未按照amfori BSCI要求建立有效的纠正措施来改善问题。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
Finding	
The auditee partially respected the principle, according to document review, management interview and workers interview to confirm that, the factory established a written production cost and capacity planning procedure, but the procedure document failed to integrate overtime time control. According to management interview to know that, the factory failed to establish a complete capacity plan to complete the expected order delivery, resulting in that monthly overtime exceeded regulatory requirements during this audit. It violated the requirements in the amfori BSCI system manual.	被审核方部分遵守该原则，通过文件查阅，管理层和员工访谈确认，工厂建立了书面的生产成本与产能规划程序，但是该程序文件未能结合加班时间管控。通过访谈管理层得知，工厂未能建立一个完善的产能计划去完成预期的订单交货，导致本次审核发现月加班超出法规要求。违反了amfori BSCI系统手册中的要求。

PA 5: Fair Remuneration

Site: Shantou LeListen Technology Co., Ltd. | Site amfori ID: 156-058988-001

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 did not respect the principle, according to management interview, worker interview and purchasing records of social insurances review, it was noted that the factory did not purchase 5-types social insurances for partial employees. Due to the latest social insurance record (November 2024), there were 48 employees in total in the factory (included one retired worker, no new employee or dispatched worker involved. The factory should purchase social insurance to 47 employees), 41 out of 47 employees did not purchase endowment insurance, work injury insurance, unemployment insurance, medical insurance and maternity insurance. Through management interview and workers interview to know that, partly workers reported that they purchased rural endowment insurance in their hometown, however, no written evidence was provided. Some workers did not like to repeat purchasing social insurances in the facility. It violated PRC Labor Law, Article 72 & 73.

被审核方未遵守该原则，通过管理层访谈、工人访谈和社保购买记录查阅发现，工厂未给部分员工购买5种类型的社保。根据最新的社保记录（2024年11月），工厂共48名员工（包括1名退休返聘员工，没有新入职员工或派遣工。工厂应为47名员工购买社保），47名员工中有41名员工未购买养老保险，工伤保险，失业保险，医疗保险和生育保险。通过管理层访谈及员工访谈得知，部分员工汇报已在老家购买了农村养老保险，但是不能提供书面的证据。部分员工不愿意在工厂重复购买社保。违反了中华人民共和国劳动法 第72条和第73条。

PA 6: Decent Working Hours

Site: Shantou LeListen Technology Co., Ltd. | Site amfori ID: 156-058988-001

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 the principle, according to management interview, workers interview and review 10 sampled workers' attendance records from 1 November 2023 to the audit date, it was noted that working hours recording system did not have capacity to control excessive working hours. Randomly selected 10 sampled workers' time records each from April 2024, August 2024 and October 2024, it was noted that the monthly overtime hours of all sampled workers for all

被审核方未遵守该原则，通过管理者访谈，员工访谈及查看10名抽样的员工从2023年11月1日至审核当天考勤记录发现，工时管控系统不能有效控制额外的加班。随机在2024年4月、2024年8月和2024年10月中各自抽取了10名抽样员工的考勤记录，发现所有抽样员工抽样月份的月加班时间均超出36小时，月加班时间最大分别达到了74小时，84小时和70小时。管理层表示，工厂没有建立有效的工时预警系统来控制工人过多加班，因此部分员工的月加班时间超过法律要求。通过员工访谈得知，工人不

Finding

sampled months had exceeded 36 hours, the maximum monthly overtime hours had reached 74 hours, 84 hours and 70 hours respectively. The management stated that the factory did not establish an effective working hour pre-warning system to control workers' overtime, therefore, some workers conducted excessive monthly overtime exceeding local law requirement. According to workers interview to know that, workers did not know about working hour control plan, workers liked to have more overtime working to get higher payment. It violated PRC Labor Law, Article 41.

知道工时控制计划，员工愿意多加班来取得更高收入。违反了中华人民共和国劳动法 第41条。

PA 7: Occupational Health and Safety

Site: Shantou LeListen Technology Co., Ltd. | Site amfori ID: 156-058988-001

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 the principle, according to document review, management interview and workers interview, it was noted that no pre-job, on-service or post-service occupational diseases examination was provided to workers exposed to occupational hazards position (For example: material crushing workers exposed to occupation hazard of noise and dust). The management stated that, the factory had provided corresponding personal protective equipment for workers using. It violated Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35.

被审核方部分遵守该原则，通过文件查阅，管理层访谈及员工访谈发现，工厂未给从事有职业病危害工种的员工（例如：碎料工人接触到噪音及粉尘职业危害）提供岗前，在岗或离岗职业病体检。管理层表示，工厂已为员工提供相应的个人防护用品。违反了中华人民共和国职业病防治法 第35条。

Question: 7.2 Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected the principle, according to documents review, management interview and workers interview, it was noted that

被审核方部分遵守该原则，通过文件审核，管理者访谈与员工访谈发现，工厂已为6名员工购买了工伤保险。但仍有42名员工未购买工伤保险或者是商业意

Finding	
the factory purchased work injury insurance for 6 employees. However, 42 employees still did not participate in work injury insurance or commercial injury insurance. The management stated that, partial workers did not want to purchase social insurance in the factory, the factory had established the procedure of work injury treatment, there was no working accident happened in last 12 months. It violated Social Insurance Law of the People's Republic of China, Article 33.	外险。管理层表示，部分员工不愿在工厂购买社保，工厂建立了工伤处理程序，过去12个月以来没有工伤意外发生。违反了中华人民共和国社会保险法 第33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 the principle, according to onsite tour, management interview and workers interview, it was noted that no local exhausting ventilation was installed for the soldering position. The management stated that, the soldering process generated less exhaust gas, the factory ignored the situation. It violated Regulations on Design of Industrial Enterprises, Article 6.1.1.	被审核方部分遵守该原则，通过现场审核，管理者访谈与员工访谈发现，焊锡工位没有安装局部抽风系统。管理层表示，焊锡工序产生的废气较少，工厂忽略了该情况。违反了工业企业设计卫生标准 第6.1.1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 the principle, according to documents review, onsite tour and management interview, it was noted that the factory did not provide the construction finished acceptance report and fire acceptance reports of one 5-storey building for review. According to onsite observation, the building structure was safe, no obvious settlement cracks and equipped with adequate fire-fighting facilities. The total area of the production building was about 1750 square meters, the completion time of the building was about 2012. The management said that, the landlord did not provide relevant documents. It violated	被审核方部分遵守该原则，通过文件审阅，现场审核及管理者访谈发现，工厂未提供1栋5层建筑的竣工验收报告及消防验收报告以供审核。通过现场观察建筑结构是安全的，没有看到明显的沉降裂缝且配备了足够的消防设施。此栋建筑的总面积为约1750平方米，建筑的竣工时间约为2012年。管理层表示，房东未提供相关文件。违反了中华人民共和国建筑法 第61条及中华人民共和国消防法 第11条和第13条。

Finding

Construction Law of the People's Republic of China, Article 61 & PRC Fire Prevention Law, Article 11 and Article 13.

PA 12: Protection of the Environment

Site: Shantou LeListen Technology Co., Ltd. | Site amfori ID: 156-058988-001

Question: 12.1 Is there satisfactory evidence that the auditee continuously identifies the significant impacts and environmental implications associated to its activity?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected the principle, according to documents review, onsite tour and management interview, it was noted that,

a. the factory did not provide Environmental impact Assessment (EIA) report and EIA approval for review. The management stated that, it was difficult to re-apply for the EIA files, and the factory was negotiating with the local environmental protection department on how to handle it. It was violated Law of the People's Republic of China on the Environmental Impact Assessment, Article 16 and Article 22.

b. the factory could not provide the Monitoring Report of the Environmental Protection Checking and Accepting or the Approval of the Environmental Protection Checking and Accepting. The management stated that, it was difficult to re-apply for the EIA files, and the factory was negotiating with the local environmental protection department on how to handle it. It was violated Management Regulations for Checking and Accepting Completed Installations of Environmental Protection of Construction Projects, Article 17.

被审核方部分遵守该原则，通过文件审阅，现场审核及管理者访谈发现，

a. 工厂未提供环境影响评估报告表及环评批复以供审核。管理层表示，补办环评文件比较困难，工厂正在与当地环保部门协商如何处理。违反了中华人民共和国环境影响评价法 第16和22条。

b. 工厂未能提供环境保护验收监测报告或者环境保护验收的批复。管理层表示，补办环评文件比较困难，工厂正在与当地环保部门协商如何处理。违反了建设项目竣工环境保护验收管理办法 第17条。

Question: 12.3 Is there satisfactory evidence of the auditee's required environmental permits and licences?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially respected the principle, according to documents review, onsite tour and management interview, it was noted that the factory

被审核方部分遵守该原则，通过文件审阅，现场审核及管理者访谈发现，工厂未进行固定污染源排污文件在线登记。管理层表示，生产工序只产生少量

Finding

did not conduct online registration for the document of Pollutant Discharge for Stationary Pollution Sources. The management stated that, the production process only generated a few exhaust gas, the factory ignored the situation. It violated Guidelines for Pollutant Discharge Registration of Stationary Pollution Sources (Trial), Article 1.

废气，工厂忽略了该情况。违反了固定污染源排污登记工作指南（试行）第1条。