

Monitored Party SHENZHEN INDLEDs CO.,LTD	amfori ID 156-062958-000	Address B403, Building 1, Jinkaijin Industry Park, Shilong Community, Shiyan Street, Bao'an District, 518108 Shenzhen, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 21/05/2025	Closing Meeting Finished Date 21/05/2025	Submission Date 28/05/2025
Expiration Date 28/05/2026	Announcement Type Semi Announced	
Site SHENZHEN INDLEDs CO.,LTD	Site amfori ID 156-062958-001	

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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

Lead Auditor: Sunny Li, registration number: CSCA 21702630

Monitoring partner: TUV Rheinland

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

Announcement type: Semi-announced

Business partner information: The facility was located at B403, Building 1, Jinkaijin Industry Park, Shilong Community, Shiyao Street, Bao'an District, Shenzhen, Guangdong, China (中国广东省深圳市宝安区石岩街道石龙社区金凯进厂区厂房—B403).

The facility was established on February 5, 2016. The facility manufactured LED Pendant / LED Floor lamp / LED Tabel and the main production process were laser-carving, injection molding for wire, assembly and packing. There was no production process subcontracted to other facilities. There was no apparent peak or low season in the facility in the past one year.

Audited location information: The facility was located in the industrial zone. There were 4 buildings in the compound. The facility only rented the part areas in B area on the fourth floor of one 4-storey production building with partial 5-storey. The total building areas used by the auditee were 850 square meters. The facility did not provide dormitory or canteen to the employees.

In the 4-storey production building: part areas of 4F: laser-carving, injection molding for wire, assembly, packing, warehouse and office.

The other areas of B area and A area and C area on the fourth floor of the same production building were rented by other 6 facilities, which manufactured electrical products and etc. There was the physical isolated separated from the auditee and the other factories. Other floors of the same production building and other buildings in the industrial zone were rented by many other facilities. There was no business relationship, common management or sharing workers identified between each other. The independent business licenses and the lease contract of the auditee were provided for review. The other facilities in the compound were out of the audit scope.

Operating shifts and hours: The time records from May 2024 to May 21, 2025 were provided for review. There was one shift for all the employees: 8:00-11:30 and 13:00-17:30. The regular overtime was conducted from 18:00 to 20:30. The 8 hours' overtime was arranged on Saturdays. All the employees were guaranteed with the seventh day off. The maximum weekly overtime for the employees were 15.5 hours.

Time recording system: fingerprint system

Salary payment details: The payroll records from May 2024 to April 2025 were available for review. The local minimum wage was RMB 2360 per month (or RMB 13.56 per hour) before March 1, 2025 and it was RMB 2520 per hours (or RMB 14.48 per hour) since March 1, 2025. The employees were paid by hourly rate. The minimum wage paid to the employees by the facility was RMB 13.56 per hour before March 1, 2025 and RMB 14.48 per hour since March 1, 2025. The factory paid the employee with the wages in current month in cash by the 7th of the next month. The factory provided the employees with pay slips. There was no unreasonable deduction in wages.

Worker number information: All the employees were hired by the facility directly. There was no security guard hired by the facility. The industrial zone was responsible for security issues in the compound. There was no child labor or young worker working in the facility. Total 22 employees including 13 male employees and 9 female employees were working in the factory. Domestic migrant worker: 11 males and 7 females. Production worker: 9 males and 8 females. There were no other special group workers (interns, apprentices, contractor worker etc.) in the facility.

Good practices: The facility provided the employees with housing allowance.

Worker organization details: There was no trade union in the factory. One worker representative was freely elected by the employees without interference from management in December 2024. The management held meetings with the worker representative regularly.

Summary of findings: PA1: insufficient management system, insufficient capacity planning; PA5: less than living wages; no social insurance coverage; PA6: overtime hours exceeded the legal requirement; PA7: the monitoring of occupational hazard factors was not conducted in the workshop; did not provide any employee with pre-job, on-job and job-leaving occupational health examination; some employees were not covered by work-injury insurance or other commercial accident insurance; missing the activated carbon mask.

Circumstances: There was no special circumstance during the audit. The facility management provided good support during assessment. The facility management agreed all findings and signed the onsite report at the closing meeting.

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 had been obtained the individual's consent during the audit.

2) There was no contractor or agency company used by the facility currently, and the relevant contract or license was not applicable. There was no government waiver approved by local government, and it was not applicable. There was no collective bargaining agreement in the facility, and it was not applicable.

SITE DETAILS

Site

SHENZHEN INDLEDs CO.,LTD

Site amfori ID

156-062958-001

GICS Classification

Sector

Consumer Discretionary

Industry Group

Consumer Durables & Apparel

Industry

Household Durables

Sub Industry

Consumer Electronics

amfori Process Classifications

N.A.

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	22	Workers
Legal minimum wage in local currency	2,520	Monthly
Lowest wage paid for regular work at the site	2,520	Monthly
Calculated living wage in local currency	3,728	Monthly
Total sample	6	Workers

Other Metrics

Male workers	13	Workers
Female workers	9	Workers
Non-binary workers	0	Workers
Permanent workers - Male	13	Workers
Permanent workers - Female	9	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	1	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	11	Workers
Domestic migrant workers - Female	7	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	13	Workers
Workers hired directly - Female	9	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	3	Workers
Sample - Female	3	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: SHENZHEN INDLEDs CO.,LTD | Site amfori ID: 156-062958-001

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	
Based on management and employee interviews, document reviews and on-site observations, the auditee partially respected this principle because: The factory had established social responsibility management policies, social responsibility procedures, and employees' handbook to implement amfori BSCI COC. However, there were still gaps between the practice and amfori BSCI COC and legal requirement: 1) The factory had developed overtime policies and established procedures for capacity planning and cost accounting, but excessive monthly overtime was still existed. The factory stated it was difficult to control monthly overtime within 36 hours. The interviewed employees stated the overtime was voluntary and they were willing to work overtime to get more overtime wages. 2) The factory had established wage and welfare policies, but the facility did not provide social insurance to 57% employees. The interviewed employees stated that they were covered by the new rural insurance, and they did not want to buy social insurance. In violation of the requirements of amfori BSCI System Manual.	基于管理层和员工访谈、文件审查和现场观察，被审核方部分尊重该原则因为：工厂建立了社会责任管理方针，社会责任程序，员工手册来执行amfori BSCI的行为守则。但是工厂在实际操作中与amfori BSCI行为准则和法律要求之间仍然存在差距：1）工厂制定了加班政策也建立了产能规划和成本核算的程序，但是月加班超时的情况还是存在。工厂表示月加班很难控制在36小时内。访谈员工表示加班是自愿的，他们愿意加班来获取更多加班费。2）工厂制定了工资和福利政策，但是工厂没有给57%的员工提供社保。访谈员工表示他们参加了新农合保险，所以不想买社保。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	
Based on management and employee interviews and document reviews, the auditee partially respected this principle because: The factory had established the written capacity planning procedure, but it was not been effectively implemented. The factory did not arrange the effective capacity plan to meet the requirements of order delivery, resulting in the overtime work of	基于管理层和员工访谈和文件审查，被审核方部分尊重该原则因为：工厂建立了书面的产能规划程序，但该程序没有有效执行。工厂没有安排有效的产能计划以满足订单交付的要求，因此导致了员工月加班超过36小时。管理表示由于生产订单安排员工加班很难控制。违反了amfori BSCI系统手册中的要求。

Finding

employees exceeding 36 hours per month. The management said the overtime work for the employees was difficult to control because of production orders. In violation of the requirements of amfori BSCI System Manual.

PA 5: Fair Remuneration

Site: SHENZHEN INDLEDs CO.,LTD | Site amfori ID: 156-062958-001

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

Based on management and employee interviews and document reviews, the auditee partially respected this principle because: According to the data provided on the official website of GLWC, the living wage of the city where the auditee was located was RMB 3728 since April 14, 2024. However, in the sampled payrolls records of September and December 2024, the remuneration (regular wage + post allowance + full attendance allowance + housing allowance + seniority award) for 20% sampled employees were paid less than the living wage, with the gaps range from RMB 50 to RMB 350. The factory management explained that they had thought overtime compensation allowance could be included in the living wage. The employees stated that they did not know how much the local living wage was. In violation of the requirements of amfori BSCI System Manual. Remark: The remuneration for the employees in April 2025 reached the local minimum living wage standard.

基于管理层和员工访谈和文件审查，被审核方部分尊重该原则因为：根据GLWC官方网站数据的提供，被审核工厂所在城市的生活工资从2024年4月14日开始是人民币3728。但是，在抽样的2024年9月和12月的工资中，20%的抽样员工的报酬（正班工资 + 岗位津贴 + 全勤奖 + 住宿津贴 + 工龄奖）均低于最低生活工资，差额从人民币50到350不等。工厂管理解释他们原以为加班费可以算入生活工资中。员工表示他们不知道当地最低生活工资的数额是多少。违反了amfori BSCI系统手册中的要求。备注：2025年4月的员工报酬达到了当地最低生活工资的标准。

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

Based on management and employee interviews and document reviews, the auditee did not respect this principle because: Insufficient social insurance

基于管理层和员工访谈和文件审查，被审核方未尊重该原则因为：工厂社会保险参保不足。工厂提供了最近一年的社保记录供审核。工厂目前有22名员

Finding

was detected in the facility. The factory provided the social insurance records of the latest one year for review. There were 22 employees in the factory currently (including 1 employee who reached retired age and no new employee, who had no requirement to have social insurance). According to social insurance records in May 2025, the factory only provided 5 kinds of social insurance to 9 employees. The facility did not provide 12 employees with retirement insurance, medical insurance, work-related injury insurance, unemployment insurance or child-bearing insurance. The employees stated that they were covered by the new rural insurance in their hometown, and they did not want to buy social insurance. The facility did not collect information about the new rural insurance. Reference law: Social Insurance Law of the People's Republic of China; Article 10, Article 23, Article 33, Article 44, Article 53.

工（包括1名达到退休年龄的员工，没有新员工，这些员工目前没有参保要求）。根据2025年5月的社会保险记录，工厂只给9名员工提供了五项社会保险。工厂没有给12名员工提供养老保险，医疗保险，工伤保险，失业保险和生育保险。员工表示他们在老家参加了新农合保险，所以不想买社保。工厂没有收集新农合保险的信息。参考法律：中华人民共和国社会保险法，第10条，23条，33条，44条和53条。

PA 6: Decent Working Hours

Site: SHENZHEN INDLEDs CO.,LTD | Site amfori ID: 156-062958-001

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

Based on management and employee interviews, document reviews and on-site observations, the auditee did not respect this principle because: The monthly overtime hours exceeded the legal requirement. The time records of 6 employees were selected in each sampled month of September 2024, December 2024 and April 2025. All the sampled employees conducted excessive monthly overtime in each sampled month, with the maximum overtime up to 54.5 hours, 54.5 hours and 52 hours, respectively. The factory had established the written overtime policy including overtime restrictions and arrangements, but the attendance system did not have overtime warning function. The management said that due to the lack of manpower, in order to complete orders on time, it was difficult to control the monthly overtime within 36 hours. The interviewed employees indicated that

基于管理层和员工访谈、文件审查和现场观察，被审核方未尊重该原则因为：月加班时间超过法规要求。2024年9月，2024年12月和2025年4月的考勤的每个月抽取6名员工。所有抽样员工在每个抽样月份都有月加班超时情况，最大月加班分别为54.5小时，54.5小时和52小时。工厂建立了书面的加班政策包括加班的限制及安排等，但是考勤系统没有加班预警功能。管理表示，由于缺少人力，为了按时完成订单，月加班很难控制在36小时以内。员工访谈表示加班是自愿的。参考法律：中华人民共和国劳动法第41条。备注：2025年5月（至5月21日）的抽样员工最大月加班是28.5小时。

Finding

overtime was voluntary. Referenced law: Labor Law of People's Republic of China, Article 41. Remark: The maximum monthly overtime hours for the sampled employees in May 2025 (till May 21, 2025) were 28.5 hours.

PA 7: Occupational Health and Safety

Site: SHENZHEN INDLEDs CO.,LTD | Site amfori ID: 156-062958-001

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

ENGLISH

LOCAL LANGUAGE

Finding

Based on management and employee interviews, document reviews and on-site observations, the auditee partially respected this principle because: The factory had established occupational health and safety management procedures. There were occupational hazard factors in the factory. The employees in the assembly section were working exposed in the environment of solder dust and chemicals (clean agent). However, the monitoring of occupational hazard factors was not conducted in the workshop in the facility. The factory did not provide any employee with pre-job, on-job or job-leaving occupational health examination. The factory management explained that it was difficult to implement due to economic costs and employee turnover. Reference law: Provisions on the Administration of Occupational Health at Work Sites, Article 20 & Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35

基于管理层和员工访谈、文件审查和现场观察，被审核方部分尊重该原则因为：工厂建立了职业健康和安全管理程序。工厂有存在职业病危害因素。组装车间的员工在焊锡烟尘和化学品（清洁剂）环境下工作。但是，工厂没有给车间做职业病危害因素监测。工厂没有给任何员工提供岗前，在岗和离岗的职业病体检。工厂管理解释考虑到经济成本和员工流动，很难去完成。参考法律：工作场所职业卫生管理规定 第二十条 & 中华人民共和国职业病防治法 第三十五条

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

Based on management and employee interviews and document review, the auditee partially respected this principle because: The facility provided 9 employees with work-related injury

基于管理层和员工访谈和文件查阅，被审核方部分尊重该原则因为：工厂给9名员工提供了工伤保险。但是，13个员工（包括1名达到退休年龄的员工）没有参加工伤保险或其他商业意外险。参考法律：中

Finding	
insurance. However, 13 employees (including 1 employee who had reached retirement age) were not covered by work-related injury insurance or other commercial accident insurance. Reference law: Social Insurance Law of the People's Republic of China, Article 33	华人民共和国社会保险法，第三十三条

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on management and employee interviews, document review and on-site observations, the auditee partially respected this principle because: The factory had established the procedure for the use of personal protective equipment and provided training for employees on the use of PPE. The employees in the assembly workshop who were exposed to soldering dust wore the anti-dust masks, but one employee in the assembly workshop who was exposed to chemical (cleaning agent) did not wear the provided activated carbon mask. The factory management explained that they provided workers with PPEs for free, but sometimes the employees forgot to wear them properly. Reference law: Work Safety Law of the People's Republic of China, Article 45	基于管理层和员工访谈，文件查阅和现场观察，被审核方部分尊重该原则因为：工厂建立了个人防护用品使用程序并给员工提供了个人防护用品使用方法的培训。组装车间接触焊锡烟尘的员工有佩戴防尘口罩，但是组装车间的一名员工接触化学品（清洁剂）的员工没有佩戴提供的活性炭口罩。工厂管理解释他们给工人免费提供了合适的个人防护用品，但是员工有时候忘记正确佩戴。参考法律：中华人民共和国安全生产法 第四十五条