

DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Auditee :	DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO., LTD
Audit Date From :	06/07/2020
Audit Date To :	07/07/2020
Expiry Date of the Audit :	Please refer to the producer profile in the amfori BSCI platform
Auditing Company:	TUEV Rheinland
Auditor's Name(s) :	Lucas Huang(Lead)
Auditing Branch (if applicable):	TUV Rheinland China



This is an extract of the on line Audit Report. The complete report is available in the amfori BSCI Platform. Access www.bsciplatform.org, for entitled users only.

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.

This is an extract of the amfori BSCI Audit Report, which is available in the amfori BSCI Platform. © amfori, 2018 - The English version is the legally binding One.



DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO.,

Audit Date: 06/07/2020

Audit Type : Follow-up Audit

DBID: 351755 and Audit Id: 185632



Rating Definitions A combination of ratings per Rating Consequence Performance Area where: Minimum 7 Performance Areas rated A The auditee has the level of maturity . No Performance Areas rated C. D or E. to maintain its These are three examples: improvement process A A A A A A A A A A A A without the need for a Very Good AAAAAAAABBB follow-up audit. AAAAAABBBBBB . Maximum 3 Performance Areas rated C The auditee has the level of maturity . No Performance Areas rated D or E to maintain its В These are three examples: improvement process A A A A A B B B B B B without the need for a Good follow-up audit. ABBBBBBC B B B B B B B B C C C The auditee needs · Maximum 2 Performance Areas rated D follow up to support its No Performance Areas rated E progress. Following the These are three examples: C completion of the audit, the auditee develops Acceptable a Remediation Plan В В AB В within 60 days. . Maximum 6 Performance Areas rated E The auditee needs These are three examples: follow up to support its D progress, Following the AAAAAA completion of the audit, Insufficient the auditee develops a Remediation Plan 0 0 0 0 0 0 0 within 60 days. amfori BSCI · Minimum 7 Performance Areas rated E Participants shall These are three examples closely oversee the Е auditee's progress as the producer may Unacceptable represent a higher risk than other business partners. A Zero Tolerance issue was identified (see Immediate actions are amfori BSCI System Manual Part V - Annex required. The amfori 5: amfori BSCI Zero Tolerance Protocol) **BSCI Zero Tolerance** Zero Tolerance Protocol is to be



followed.



DBID: 351755 and Audit Id: 185632

Audit Type : Follow-up Audit

Audit Date : 06/07/2020

Main Auditee Information



Name of producer :	DONGGUAN HARMONY ELECTRONIC TEC	DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO., LTD										
DBID number :	351755	151755										
Audit ID :	185632											
Address :	Hongyun Road, Shuibei Industrial Zone, S	Hongyun Road, Shuibei Industrial Zone, Shipai Town Dongguan										
Province :	Guangdong	Country :	China									
Management Representative :	Ms. Juan Guo/ HR and Administration Manager											
Contact person:	Juan Guo	Sector:	Non-Food									
Industry Type :	Mechanical and electrical engineering	Product group :	Electrical supplies									
Product Type :	Earphones											





DBID: 351755 and Audit Id: 185632

Audit Date: 06/07/2020

Audit Type : Follow-up Audit

Audit Details					
Audit Range :	☐ Full Audit	⊠ Follow-u	ıp Audit		
Audit Scope :		☐ Main Au	ditee & Farms		
Audit Environment :		Agricult	ural S	Small Producer	
Audit Announcement :	⊠ Fully-Announced	☐ Fully-Un	announced 🗌 S	Semi-Announced	
Random Unannounced Check (RUC) :	No				
Audit extent (if applicable) :	none				
Audit interferences or contingencies (if applicable) :	none				
Overall rating :	С				
Need of follow-up :			If YES, by :		

Rating per Performance Area (PA)												
PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	Α	A	Α	A	D	A	A	A	A	A	A	A

Executive summary of audit report

Leader auditor (Lucas Huang)'s APSCA number: 21701891

DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO., LTD (东莞合律美电子科技有限公司) was located at Hongyun Road, Shuibei Industrial Zone, Shipai Town, Dongguan (东莞市石排镇水贝工业区鸿运路). Based on site tour, the factory occupied with one 3-storey office building, two 4-storey production buildings, two flat iron warehouse buildings, one 4-storey worker dormitory building (canteen and kitchen on the 1st floor) and one 4-storey

management dormitory building. No transportation was provided. No other factory or company in the facility compound.

The main product of the factory were earphones, and the processes were injection molding, assembly, testing and packing. No obvious peak season and non-peak season was found in the last 12 months. No subcontracted workers were used in the facility.

- 1. No production process was subcontracted by the auditee.
- 2. There are no agencies used by the auditee, no contractor, no government waivers and no collective bargaining agreement, which makes them not applicable.
- 3. The auditor took photos, reviewed documents and worker interviewed freely an d the factory representative signed the audit finding report.

 4. No finding was detected in PA3, PA4, PA8, PA9, PA11, PA13 at previous audit.





DBID: 351755 and Audit ld: 185632 Audit Type : Follow-up Audit

Audit Date : 06/07/2020

Ratings Summary



Auditee's background information									
Auditee's name :	DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO., LTD	Legal status :	Limited company						
Local Name :	东莞合律美电子科技有限公司 (91441900334814055Q)	Year in which the auditee was founded :	2015						
Address :	Hongyun Road, Shuibei Industrial Zone, Shipai Town	Contact person (please select) :	Juan Guo						
Province :	Guangdong	Contact's Email :	ad01@audio- harmony.com						
City:	Dongguan	Auditee's official language(s) for written communications :	Chinese						
Region :	North East Asia	Other relevant languages for the auditee :	English						
Country:	China	Website of auditee (if applicable) :	www.audio-harmony.com						
GPS coordinates :	N23°5'55" E113°57'19"	Total turnover (in Euros) :	16900000.00						
Sector :	Non-Food	Of which exports % :	65.00						
Industry :	Mechanical and electrical engineering	Of which domestic market % :	35.00						
If other, please specify :		Production volume :	1200000 pcs per year						
Product Group :	Electrical supplies	Production cost calculation :	Yes						
If other, please specify :		Lost time injury calculation cost :	Yes						
Product Type :	Earphones								

Auditee's employment structure at the time of the audit											
Total number of workers : 246	Total number of workers in the production unit to be monitored (if applicable) :										
		MALE WORKERS	FEMALE WORKERS								
Permanent workers		116	130								
Temporary workers		0	0								
In management positions		10	6								
Apprentices		0	0								
On probation		0	0								
With disabilities		0	0								
Migrants (national citizens)		94	95								
Migrants (foreign citizens)		0	0								
Workers on the permanent payroll		116	130								
Production based workers		0	0								
With shifts at night		6	2								
Unionised		0	0								
Pregnant		-	0								
On maternity leave		-	0								





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: D

Deadline date:05/07/2021

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

The factory had established social accountability management system to ensure amfori BSCI COC was respected. The factory regularly provided trainings on social accountability knowledge and also conducted regular internal audit to assess the factory's social policies. The factory had monitored social performance assessment to their main suppliers based on amfori BSCI COC. And the factory requested their suppliers to sign social accountability commitment letters, amfori BSCI COC and TOI.

工厂建立了社会责任管理体系来确保amfori BSCI行为守则被遵从。工厂有定期提供社会责任知识的培训,也定期进行内审来评估工厂的社会责任 工厂根据amfori BSCI行为守则的要求对其主要供应商进行了社会责任监控,同时要求其签署了社会责任承诺书、amfori BSCI行为守则和 商业合作伙伴的专用实施条款。

The auditee established related amfori BSCI management procedures, but the procedures were not always followed. For example, the overtime working hours was not controlled as per established procedure, the auditee did not provide social insurance for all workers, and also there were some findings found in PA7. The factory management said that the production was busy and workers would like to work more overtime, per worker interview, workers said that they would like to work overtime for more overtime wage.

被审核方建立了amfori BSCI相关的管理程序,但是这些程序并不总是被遵守。比如,工厂的工作加班时间没有按制定的控制程序进行管控,被审核方也没有为所有工人购买保险。同时在PA7章节发现的一些问题。工厂管理层说生产比较忙且工人愿意加更多的班。根据与工人访谈,被访谈的 工人表示他们愿意加更多的班以获得多点加班工资。

The auditee established capacity planning procedure. However, it was not effective due to the overtime working hours exceeded law requirement in all sampled months. (Details as finding in PA 6). 被审核方有建立产能规划程序。但是该程序不是有效的,基于工人的加班在所有抽样的月份超出了法规要求(详情如审核PA6的不符合)。

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: D

Deadline date: 06/08/2020

Good practices

None

Areas of improvement

The auditee had established social compliance procedures to implement BSCI CoC. Internal assessment and management review were performed in May 2019. Ocean Zhang (HR and Administration Manager) was responsible for the establishment, implementation and maintenance of the BSCI system. The significant business partners signed social responsibility commitment letter. In addition, the auditee regularly conducted social compliance assessment to significant business partners. BSCI system was implemented generally at the factory and no zero tolerance findings were identified during the audit. However, gaps had been identified in the performance area. 工厂建立了社会责任程序来执行BSCI行为准则。工厂在2019年5月有进行内审及管理评审。张汝海(人事行政经理)来负责BSCI管理系统的建立、施行

和维护。重点商业伙伴签署了社会责任承诺书,另外对重要商业伙伴进行了定期的社会责任评估。BSCI系统在工厂大体被执行,审核中未识别到零 容忍发现点。但是,在该执行领域仍然存在差距。

- The auditee established social compliance policy and procedures based on BSCI standards. However, the facility did not set up a fully effective 1.1 management system to implement the BSCI Code of Conduct and some noncompliances were identified during the audit in some performance areas. For example: Existing excessive monthly overtime; Social insurance did not fully cover all workers; Audit findings for health and safety etc. 被审核方基于BSCI标准建立起了一套社会责任政策和程序。但是,被审核方未能建立一个完全有效的BSCI管理体系以执行BSCI行为守则的要求,当 前审核在几个执行领域发现一些有待完善的地方。例如存在超时加班;员工社保覆盖不足;健康安全中发现的问题等等。
- The auditee provided production plan, but did not provide capacity planning and product cost calculations records for review. And the employees' monthly overtime had exceeded legal limit of 36 hours per month. 被审核方提供了生产计划表,但是没有提供产能规划和生产成本核算记录。另外员工的月加班也超过了每月**36**小时的法规限值。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Date: 06/07/2020 Audit Type: Follow-up Audit

Performance Area 2: Workers Involvement and Protection

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date: 05/09/2020

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

Workers could exchange sound information with worker representatives in terms of workplace issues smoothly. Workers and representative could express any suggestion or compliant through suggestion box without any retaliation. Trainings on amfori BSCI COC were provided and the factory had posted amfori BSCI COC in workshops.

员工与员工代表就工作场所的情况可以进行良好沟通。员工与员工代表可以通过意见箱提出意见或投诉,不会遭受打击报复。amfori BSCI行为守 则的培训有提供,且工厂将amfori BSCI行为守则张贴在生产车间内。

The grievance mechanism was insufficient, missing no timelines to deal with grievances, without identifying potential conflicts of interest and how to overcome them. The facility management stated that they did not how to improve it before, not aware of the meaning of the finding before. 申诉机制不完善,缺少申诉解决的时效性,未识别潜在的利益冲突以及如何解决该冲突。工厂方面表示之前不知道如何改善,未能理解此问题的含

Remarks from Auditee:

None

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:31/10/2019

Good practices

None

Areas of improvement

The social compliance procedures including workers involvement and protection were set up based on BSCI standards at the factory. BSCI Code of Conduct in local language was displayed at the factory. The auditee defined long term goals to protect employees according to BSCI CoC. Based on document review and workers interview, the workers were provided training regarding rights and responsibilities and workers were aware of their rights and responsibilities. The auditee provided BSCI trainings for worker representative, managers and other decision-makers. However, gaps had been identified in the performance area.

工厂已经基于BSCI标准建立了社会责任程序,其中包含了员工参与和保护的部分。工厂有把本地语言的BSCI行为准则张贴出来。工厂根据BSCI行为准则建立起了长期目标以保护员工。通过文件评审和员工访谈,工厂有提供员工权利和责任的培训和工人知道其权利和责任。被审核方提供了BSCI 方面的培训给工人代表、经理和其他决策者。但是,在该执行领域仍然存在差距。

The grievance mechanism was established by the factory, but the mechanism was insufficient as per provided evidences: a) no timelines to deal 2.5 with grievances; b) did not define potential conflicts of interest and how to overcome them (e.g. if a grievance was against the person who administered the mechanism).

工厂建立了申诉机制,但是不完善: a)没有申诉解决的时效性; b) 未定义潜在的利益冲突以及如何解决该冲突(如果申诉的对象是申诉机制的管理人 员)。

Remarks from Auditee

Performance Area 3: The rights of Freedom of Association and Collective Bargaining

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

Not rated

AREAS OF IMPROVEMENT:

Not rated

未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The auditee set up the procedure to guarantee the rights of freedom of association and collective bargaining. There was no trade union established at the factory. There were 2 worker representatives who were freely elected by workers in March 2019. Worker and worker representatives could freely communicate with each other. Based on workers and worker representative interview, they were not limited by the auditee on forming, joining and voting for a legal worker organization and collective bargaining.

被审核方建立起了程序以保证自由结社和集体谈判的权利。工厂没有成立工会。在2019年3月由工人自由选出2名员工代表。员工与员工代表之间可 以自由的沟通交流。根据员工和员工代表的访谈,被审核方没有任何限制员工成立、参加和投票一个合法工人组织和集体谈判。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Date : 06/07/2020

Audit Type : Follow-up Audit

Performance Area 4: No Discrimination

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES: Not rated

AREAS OF IMPROVEMENT:

Not rated 未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The factory set up no discrimination management procedure and all employees were trained regarding the procedure. Based on document review and worker interview, there was no discrimination regarding gender, region, religion belief, marriage status, origin, age, etc during recruiting process and working process. Currently, no discrimination case was reported by the employees.

工厂建立了反对歧视管理程序,对所有员工进行了相关程序的培训。通过文件评审和工人访谈,在招聘和工作过程中无性别、地域、宗教信仰、婚姻 状况、血缘、年龄等歧视。当前并无员工汇报存在歧视的情况。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Performance Area 5: Fair Remuneration

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date: 05/07/2021

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

The factory had developed written wage and benefit policies. Wages were issued before the 22th day of the following month by bank in monthly rate. No delay payment issues ever occurred in the factory. There were no unreasonable deductions in the factory. During this audit, wage records from July 2019 to May 2020 were reviewed and noted that the minimum wage paid by the factory was at least RMB1850 per month, which was higher than local minimum wage RMB1720 per month since 1 July 2018. The factory had also provided paid annual leave to workers, who could also applied relevant leaves such as marriage leave, maternity leave, paternity leave, sick leave and etc. as required. Workers were paid 150% of normal rate for overtime work on weekdays and 200% of normal rate for overtime work on weekends. No production activities were arranged on Sundays and statutory holidays. According to the factory policy and employees' interview, it was noted that the factory would pay 300% of normal rate as compensation for workers who had worked on statutory holidays. However, gaps were still noted in implementation. 5.4 Corrected. The facility management was aware of the meaning of fair remuneration, and the wage to employees were higher than it.

工厂制定了书面的薪酬福利政策。工厂每月22号前以银行转帐的形式发放工人上月的工资,工人的工资是月薪的。工厂从未拖欠工人的工资,没有不合理的扣款。此次审核查阅了2019年7月至2020年5月的薪资记录,发现工厂支付给员工的最低工资为至少RMB1850元每月,高于当地的最低工资标准RMB1720元每月,该标准从2018年7月1日起实施。工厂亦给员工提供了带薪年休假的福利,工人亦可根据需要申请相应的假期,如婚假、产假、陪产假、病假等。工人获得了足额的加班工资,工人在工作日加班获得了正班工资的1.5倍,在周末加班获得了正班工资的2倍。工厂没有在周日和假日安排工作。根据工厂的政策和工人访谈,员工如果在法定节假日加班,工厂会提供正班工资3倍的补偿。但是在实际执行过程中仍存在 缺失。5.4 已改善。工厂管理人员清楚知道公平需求工资的定义,且支付给员工的工资高于它。

5.5 -The auditee did not participate social insurance for 100% workers. Social insurance receipts in June 2020 (records of September 2019 to June 2020 were provided for review) showed that 175 out of 228 workers (not including 4 retired workers and 14 employees hired after 1 June 2020) did not have retirement insurance, maternity insurance, unemployment insurance, medical insurance and work-related insurance. The factory management said that local government accepted that partial employees had social insurance, and most of workers did not want to participate in social insurance, and the factory provided social insurance according to workers' will. The interviewed workers said that they would not like to participate social insurance due to they have new rural cooperative medical service. The management said that they knew that some workers had new rural cooperative medical service, but they did not collect related evidence. Reference law: Labor Law of the People's Republic of China, Article 72 and 73. Remark: The factory had provided employer's liability insurance for 230 workers, covering the workers who were without injury insurance, valid from 6 July 2020 to 5 July 2021. Per social insurance records, the facility provided social insurance to 71 persons, the facility management stated 18 out of them were the friends of the boss, and provided relevant records for review.

被审核方没有为所有员工参保。工厂2020年6月的参保收据(2019年9月到2020年6月的社保记录有提供查看)显示228名工人(未包含4名达到退休年龄的员工,以及14名2020年6月1日以后入职的员工)中的175名工人没有养老保险,生育保险,失业保险,医疗保险和工伤保险。工厂的管理层说当地政府接受工厂部分员工参加社会保险,多数工人不愿意参加社会保险,工厂根据工人的个人意愿为工人参保。被访谈的工人表示他们不愿意参加社会保险是因为他们参加了新农合。工厂管理层知道部分工人参加了新农合,但是工厂并没有收集这方面的证据。参考法规:中华人民共和国劳动法第七十二条和七十三条。备注:工厂为230工人购买了雇主责任险,覆盖了未参加工伤保险的员工,有效期为2020年7月6日到2021年7月5日。根据社保记录,工厂有为71人提供社保,工厂表示其中有18名为老板的亲戚朋友代买,提供了购买记录查看。

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: B

Deadline date:06/08/2020

Good practices

None

Areas of improvement

The factory established wage system based on BSCI standards and local requirements. The employees were paid by hourly rate. Workers were paid on or before 22th of following month by bank transfer. The payroll records from Jul 2018 to Jun 2019 were provided for review. Auditor selected payroll records of Dec 2018, Mar 2019 and Jun 2019 as samples. The lowest wage paid to workers was RMB1800 per month which was higher than local law requirement (RMB1720 per month). They were paid 150%, 200% and 300% of normal rate for overtime at weekdays, rest days and statutory holidays respectively. When no overtime was arranged at statutory holidays and normal wage was paid for workers at statutory

holidays. No illegal deduction was made at the factory. However, gaps had been identified in implementation. 工厂有基于BSCI标准和当地法规要求建立起了一套薪酬系统。员工以时薪支付。工资在下月22号或之前通过转账发放。工厂提供了2018年7月至2019年6月的工资记录,抽样月份为2018年12月,2019年3月及2019年6月。工厂支付员工最低基本工资为每月1800元高于当地法定的最低工资标准 (每月1720元)。员工在工作日、休息日和法定假加班的加班费分别按照正班工资的150%、200%和300%支付。当工人没有加班在法定假,在法定假 工厂有支付工人基本工资。没有非法扣款的情况。但是在执行的过程当中还是存在以下差距:

- 5.4 -The total remuneration provided to workers could allow them to have a decent standard of living in the region. However, the factory was not aware of local living wage and local living cost. 提供给工人的总报酬能够使工人在当地过上体面的生活标准,但是工厂对当地生活需求工资没有意识,对当地生活成本不了解。
- Not all the employees were covered by social insurance. Based on latest roster and social insurance records of Jun/Jul/Aug 2019 review, there were total 248 workers. There were 6 retirees. There were no newly joined workers, temporary or dispatch workers at the factory. However, as per social insurance of Aug 2019 review, only 23.55% employees were covered by retirement insurance, maternity insurance and unemployment insurance. 23.97% employees were covered by work-related injury insurance and medical insurance. In addition, 40.32% employees were covered by group commercial insurance and valid date of group commercial insurance was from 6 Jul 2019 to 5 Jul 2020. Based on worker interview, the workers who did not purchase social insurance were covered by rural cooperative medical insurance, so they were not willing to purchase social insurance. (China Labor Law. Article 72).

员工社保购买不足。根据提供的最新的花名册和2019年6月、7月和8月的社保凭证,工厂共有248名员工。工厂有6名退休工,无新员工、临时工和派遣工。根据2019年8月的社保记录评审,仅23.55%员工购买了养老保险、生育保险及失业保险。23.97%的员工被工伤保险和医疗保险覆盖。另外,40.32%员工被团体商业保险覆盖,有效期从2019年7月6日至2020年7月5日。根据员工访谈,没有购买社保的员工有农村合作医疗保险,所以没有意 愿再买社保。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632 Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Performance Area 6: Decent Working Hours

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: D

Deadline date:05/07/2021

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

The factory had developed working hour policies and stipulated that the normal working hours were 8 hours per day and 40 hours per week. The factory adopted electronic attendance machine (fingerprint scan system) to record employees' working hours. Most production workers and office staffs worked one shift and the detailed working schedule was 08:00-12:00, 13:30-17:30 (the facility changed to the same working schedule after previous audit). Two shifts were arranged for injection molding workers, 8:00 to 11:30, 12:00 to 16:30 and 20:00 to 23:30, 0:00 to 4:30. The factory directly hired four security guards and they operated three shifts and the detailed working schedules were 08:00-16:00, 16:00-00:00 and 00:00-08:00. The factory also directly hired 2 canteen staffs and they only operated one shift and the detailed working schedule was 09:00-13:00, 15:00-19:00. During this audit, time records from July 2019 till the audit day were reviewed (time records of July 2019 were only used to check the payroll records of July 2019) and noted that the maximum monthly overtime hours was 80, the maximum daily overtime hours was 2 and the maximum weekly overtime hours was 18. Overtime work in the factory was voluntary and the factory did not force workers to work overtime. Workers were provided at least one day off each week and they could ask for leave freely. However, gaps were still noted in implementation.

工厂制定了工作时间的政策,规定正常工作时间为每天8小时,每周40小时。工厂使用电子考勤(指纹识别系统)记录员工的工作时间。大部分生 产工人和办公室人员执行一班制,具体的上班时间为每人8万时,每周40万时。工厂使用电子或到《指数次加尔机》(北京江市时间)。大部分工产工人和办公室人员执行一班制,具体的上班时间为08:00-12:00,13:30-17:30(上次审核后更改为了统一的作息时间)。注塑员工为两班制度8:00-11:30, 12:00-16:30 and 20:00-23:30, 0:00-4:30.工厂直接雇佣了4名保安,他们执行三班制,具体的上班时间为08:00-16:00, 16:00-00:00, 00:00-08:00。工厂亦直接雇佣了2名厨房工作人员,他们执行一班制,具体的上班时间为09:00-13:00, 15:00-19:00。此次审核查阅了2019年7月至审核当天的工时记录(2019年7月的工时记录仅为验证其相应的工资记录),发现工厂最多月加班为80小时,最多日加班为2小时,最多周加班为18小时。工厂的加班自愿,没有强迫加班,工人每周休息至少一天,工人可以随时请假。但是在实际执行的过程中仍存在缺失。

Factory did not have effective system to control its overtime as law required. There was a written policy on overtime working hours including 6.2 overtime limits and overtime arrangement. However, the working hour record system could not alert when overtime was near or over the overtime limits. Management also had no effective measures to control working hours. Attendance records from July 1, 2020 to audit date were provided for reviewing. It was noted that most employees' monthly overtimes exceeded 36 hours. 15 employees were randomly selected for December 2019, April 2019 and May 2020, it was noted the excessive monthly overtime was detect for all 15 sampled employees, and maximum monthly overtimes were 76 hours in December 2019, 66 hours in April 2019 and 80 hours in May 2020. Through management interview, they could not balance the orders, material prepared status each month and it was difficult to keep monthly overtime within 36 hours. Through worker interview, they would like to have some overtime to earn overtime compensation; they did not think the workload was heavy in the factory. Remark: the maximum monthly overtime for sampled workers in June 2020 and from July 1, 2020 to the audit date was 74 hours and 20 hours respectively Reference law: article 41 of PRC Labor Law.

工厂没有符合法律要求的有效考勤系统来控制员工加班工作。公司有书面的加班政策包括加班的限制及安排等,但是公司的考勤系统没办法预警当 其加班时间快超过或已经超过要求时。管理人员也没有有效的控制工时的措施。审核了2019年7月1日至审核当天的考勤,发现这期间,大部分月 员工的月加班时间都超过了36小时。随机抽取了15名员工的2019年12月,2020年4月以及2020年5月的考勤记录查看记录,发现15名员工的月加班 时间都存在加班超时的情况,最大为2019年12月76小时,2020年4月66小时,2020年5月为80小时。根据管理层访谈,他们无法平衡每个月的订单和备料情况,很难控制月加班在36小时以内,工人访谈,他们也希望通过一些加班获取加班费,他们不认为工厂的工作量繁重。备注:2020年6月 及7月1日至审核当天,抽样员工最大月加班分别为74小时和20小时。参考法规:中华人民共和国劳动法第41条。

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: D

Deadline date: 06/08/2020

Good practices

None

Areas of improvement

Electronic attendance system was used to record workers' working hours. Through management interview and document review, there was no obvious low or peak production season. The attendance records from Jul 2018 to audit day were provided by the factory. Attendance records of Dec 2018, Mar 2019 and Jun 2019 were selected as samples. The normal working hours were 8 hours per day and 40 hours per week. Employees at least had one day off per week. Through worker interview, overtime work was conducted on voluntary basis. However, gaps had been identified

工厂使用电子考勤系统记录员工的工作时间。根据管理层访谈及文件评审,工厂没有明显的生产淡旺季。工厂提供了**2018**年7月至审核日的考勤,抽 样的考勤月份为2018年12月,2019年3月及2019年6月。正常工作时间是每天8小时每周40小时。员工每周至少休息一天。根据员工访谈,加班是自 愿的。但是在执行的过程当中还是存在以下差距:

Sampling 17 employees' time records were in Dec 2018, Mar 2019 and Jun 2019. The monthly overtime hours exceeded legal limit of 36 hours in sampled months. The maximum overtime hours were 103 hours in Dec 2018, 103 hours in Mar 2019 and 101.5 hours in Jun 2019. (PRC Labor Act (1995), Article 41).

抽样17名员工的考勤在2018年12月、2019年3月和2019年6月。月加班超过法定的36小时,最大月加班2018年12月为103小时、2019年3月为103小 时、2019年6月为101.5小时

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Performance Area 7 : Occupational Health and Safety

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date: 05/01/2021

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

Written H&S policies were provided for review. H&S committee was established in the factory and H&S meetings were held regularly. The main risks in workplaces were fire accident, chemical injures and food poisoning etc. The factory provided free drinkable water and food and workers never complained about the quality of food and drinking water. Sufficient firefighting facilities were equipped such as fire extinguishers, fire hydrants, sprinkler system and etc. All safety exits were properly installed with emergency lights and safety exit signs. Fire drills were conducted twice a year. Interviewed workers were aware of how to use fire extinguishers and how to evacuate from production and dormitory areas under emergency situations. No work-related injury issues ever occurred in the factory in the past 12 months. The factory had provided sufficient first aid supplies in production and dormitory areas and 4 first aid personnel were available. First aid certificates were provided for review. The factory had provided free catering and dormitory services. The living space of the dormitory could meet the requirements of workers. Sufficient firefighting facilities were also installed in dormitory areas. However, gaps were still noted in implementation. Remark: Till the audit day, the factory did not provide transportation services to workers. 7.1 Partially corrected. Generally, health and safety system was effectively operated in the facility. The facility had corrected partial findings detected in previous audit. 7.2 Corrected. All employees were covering with social insurance or commercial insurance. Regarding occupational health check move from 7.3 to 7.1 7.11 Corrected. The facility had provided fire safety approval and building safety approval for all buildings. 7.22 Corrected. The facility had provided 2 valid kitchen workers' certificate for review.

书面的健康安全政策有提供查阅。工厂成立了健康安全委员会,且定期召开安全会议。工厂生产现场的主要健康安全风险是火灾、化学品伤害和食 物中毒等。工厂免费提供了饮用水和餐食,员工没有抱怨食物和水的品质。足够的消防器材有配备,如灭火器、消防栓、喷淋系统等。所有的安全 出口上方均正确安装了应急灯和安全出口标识。消防演习每年举行两次,受访的员工知晓如何使用灭火器以及在紧急情况下如何逃离生产和生活区 证。工厂在过去12个月没有发生工伤事故。工厂在生产和生活区域均提供了充足的急救药品,并配备了4名急救人员,急救员证书有提供查阅。工厂免费提供了餐食和宿舍服务,宿舍的居住空间能满足员工的需求,宿舍区域内亦配备了足够的消防器材。但是在实际执行过程中仍存在缺失。备注:截至审核当天,工厂尚未提供交通服务给员工。 7.1 部分改善。整体上来讲,工厂的健康安全体系能有效地运行,针对之前审核的部分问题有进行整改。 7.2 已改善。所有员工都有覆盖商业保险或者社保。 7.3 有关职业病体检移到7.1 7.11已改善。工厂有提供所有建筑的消防验收以及竣工 验收查看。 7.11 已改善。工厂有提供两名厨工的有限健康证查看。

- No pre-job, on-job off-job occupational diseases examination was provided to workers exposed to occupational hazardous factors (e.g. observation position with chemical factor, crushing process with noise). The facility management stated that there was no relevant person in charge to follow up this finding, and it would be improved step by step. Reference law. Law of the People's Republic of China on Prevention and Control of Occupational Diseases, Article 35 没有给与职业病危害因素接触的人员提供岗前, 在岗和离岗前职业病健康体检(如外观检查涉及化学因素,碎料岗位涉及噪声).工厂方面表示之前没 有相关负责人跟进此问题点,后续会逐步完善。参考法律法规: 中华人民共和国职业病防治法第三十五条.
- The facility had provided activated carbon mask and finger cover to employees contacting chemical. However, around 20% of workers who contact chemical did not properly use them, including not using them or using the improper one during working time. The facility management stated that some workers thought it was not convenient when wearing PPE. Reference law: Safety Law of the People's Republic of China, Article
 - 工厂有给接触化学品的员工提供活性炭口罩和手指套。但约**20%**的接触化学品的员工未能恰当使用,包括工作期间未使用或者使用不当的防护用品。工厂方面表示部分员工认为使用个人防护用品不方便工作。参考法律法规:中华人民共和国安全生产法 第四十二条.
- No MSDS was provided at onsite chemical (such as glue, thinner, alcohol, etc.) usage areas. In addition, around 30% of chemical (such as glue, thinner) at usage and storage area was missing safety labels. Reference Law: Regulation of Chemical Safety Usage in Workplace, Article 12 现场使用的化学品(如胶水,白电油,酒精等)的场所未提供MSDS. 另外,约30%储存以及使用化学品(如胶水,白电油等)的场所,均缺少安 全标 签。参考法律法规:工作场所安全使用化学品规定第十二条
- 7.22 During the audit, no cleaning suppliers and tissues were provided in the toilet. The facility management stated that they had provided them in the toilets before, but they did not supplement them timely.

审核期间,洗手间未提供纸巾和清洁用品。工厂方面表示之前有提供,但未能及时补充。

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date: 31/12/2019

None

Areas of improvement

Good practices

The auditee established occupational health and safety policies and procedures based on BSCI standards and local law requirements. Regular health and safety training was provided to employees. Sufficient safety exits were available at each area. Safety exits were installed with emergency lights and exit signs. Safety exits were not locked and emergency escape routes were not blocked. Fire fighting equipments were sufficient and inspected regularly. Through on site checking, pressure of fire extinguishers was within normal range. Through on site testing, water pressure of fire hydrant was enough. Fire evacuation drills were conducted twice per year and last drill was conducted in Apr 2019. Sufficient first aid supplies were available at each area which could be freely used for workers if need. There were four first aiders at the factory. The temperature, humidity, space, sanitation and illumination were adequate for the health and safety of workers. Canteen's food business license was provided.

- (Remark: No public transportation was provided to employees) However, gaps had been identified in implementation. 工厂基于BSCI标准和当地法规对于职业健康和安全的要求建立了政策和程序。工厂为工人提供了定期的职业健康培训。每个区域有足够的安全出口,安全出口有安装应急灯和出口标识。工厂的安全出口没有被上锁疏散通道没有堵塞。消防设施在厂内配置足够并对其进行了定期检查。经现场检查,灭火器的压力在正常的区域内。经过现场测试,消防栓水压足够。工厂消防疏散演习1年进行2次,上次演习是在2019年4月进行。每个区域有足够的急救用品供需要的员工免费使用。工厂共有4名急救员。饮用水免费提供给所有员工。工作场所的温度、湿度、空间、卫生、照明足以确保工人 的健康和安全。提供了食堂的食品经营许可证。(备注:工厂没有给员工提供公共交通)但是在执行的过程当中还是存在以下差距:
- The auditee was in line with part of the regulations on occupational health and safety relevant for its activities such as the regulations on fire safety, first aid, etc. The health and safety regulations were not fully followed due to the findings listed as follows in PA7. 被审核方部分符合了职业健康安全与其活动相关的规定如关于消防安全、急救等方面的规定。由于存在本执行领域提到的下列问题,工厂没有完全遵 循安全卫生的法规要求。
- Social insurance records of Jun/Jul/Aug 2019 were provided. There were totally 248 employees at the factory. Based on social insurance records of





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Aug 2019 review, only 58 employees were covered by work-related injury insurance under social insurance system and 100 employees were covered by group commercial insurance, while the factory did not provide any other kind of insurance for the other 90 workers in case of accident. 2019年6月、7月和8月的社保凭证有提供审核。工厂现有员工248人,根据2019年8月的社保记录评审,58名员工参加了社保体系的工伤保险,100名 员工参加了团体商业险,但工厂没有为其他的90员工提供其他形式的保险来作为意外保障。

The factory provided the evaluation report on occupational hazard factors for review. However, occupational health examination was not provided 7.3 to the workers who contact occupational hazardous factor, such as workers contacting chemicals. (PRC Law on Prevention and Control of Occupational Diseases (2002) Amendment (2017), Article 35)

企业提供了职业危害因素监测报告供审阅。但是工厂没提供职业健康体检给接触职业危害因素的员工,例如接触化学品的员工。

- 7.6 -The factory provided training to employees on how to use PPE. However, it is noted that one using chemicals employee in assembly and packing workshop did not wear carbon-active masks, one hand was wearing cotton glove but not rubber glove and one hand was not wearing glove. (Production Safety Law of the People's Republic of China, Article 42) 工厂有给员工提供劳保用品使用培训。但是,审核发现组装包装车间1名使用化学品的员工没有佩戴活性炭口罩,一手戴的是棉手套不是胶水套, 手没有佩戴手套。
- 7.11 Based on observation on site, factory buildings looked stable and safe. However, factory could not provide construction approval of all factory buildings for review. In addition, 4th floor of two 4-storey production buildings was expanded floor which was used as warehouse (the original floors of the production building were 3 floors). However, fire license of 4th floor of two 4-floor production buildings was not provided for review. Remark: 4th of two production buildings were expanded around the year of 2016 and 2018 respectively. (PRC Construction Law (1998), Amendment (2011), Article 61, PRC Construction Law Article 61)

现场观察工厂建筑外观上稳固、安全。然而,但工厂仍未能提供所有建筑的竣工验收报告供评审。2幢4层生产楼的第4层为加盖楼层用作仓库(原始建筑为3层),但是没有提供2幢4层生产楼的第4层消防验收报告。备注:根据管理者访谈,2幢生产楼的第4层大约在2016年和2018年加建。

- 7.21 The canteen was clean and hygienic and canteen's food business license was provided. However, five cooks' health certificates were not provided for review. (Law on Food Safety, article 45) 工厂的餐厅干净卫生,提供了食堂的食品经营许可证,但是没有提供5名厨工健康证。
- 7.22 Toilets were clean. But no tissue and soap were provided. 洗手间卫生干净, 但是没有提供纸巾和肥皂。

Remarks from Auditee

Performance Area 8: No Child Labour

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

Not rated

AREAS OF IMPROVEMENT:

Not rated 未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The auditee set up policy and procedure to stop from hiring child labor. HR employee would check each new employee' ID during the hiring process, and employees' ID copies were kept. Currently no child worker was recruited and the youngest worker was 18 years old at the factory.

被审核方建立了政策和程序去防止雇佣到童工。招聘时人事员工将检查新员工的身份证并保留了身份证复印件。当前工厂没有招用童工,最年轻员工 的年龄为18岁。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Performance Area 9: Special protection for young workers

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

Not rated

AREAS OF IMPROVEMENT:

Not rated

未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The factory set up policies and procedures to identify and protect young workers. The young workers protection procedure was also set up to deal with young worker issues and minimize the risks. The factory management was aware of legal requirement of young worker protection. Currently, there was no young worker at the factory and the youngest worker was 18 years old at the factory.

工厂建立了政策和程序去识别和保护未成年工。未成年工保护程序也建立了去处理未成年工事项和降低风险。工厂管理层清楚未成年工保护方面的法 规要求。当前工厂没有未成年员工,最年轻员工的年龄为18岁。

Remarks from Auditee

Performance Area 10: No Precarious Employment

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

All workers were directly hired by the factory and no dispatch workers, seasonal workers, student workers and etc. were hired by the factory. Workers had signed employment contracts with the factory within one month after they were hired officially. Employees kept one copied contract themselves. Labor contract content were displayed in local language and interviewed workers were aware of the labor contract content. NC10.1 moved to 5.5

所有的工人均为工厂直接招聘,没有派遣工、季节工、学生工等。工人在入职后的一个月内均与工厂签订了劳动合同,并自己保留了一份劳动合同。劳动合同亦当地语言呈现,受访的工人知晓劳动合同的内容。 问题点10.1移到5.5

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:06/08/2020

Good practices

None

Areas of improvement

The factory established a policy based on BSCI standards and local law requirements to protect employment relationship. All hired workers signed labor contracts with the auditee (DONGGUAN HARMONY ELECTRONIC TECHNOLOGY CO., LTD) within one month and were provided copies of labor contracts as well. There was no evidence to show the factory tried any unfair employment method to reduce its obligations. However, gaps had been identified in implementation.

工厂基于BSCI的标准和当地法规要求建立了包含雇佣关系的政策和程序。工厂(东莞合律美电子科技有限公司)会与所有雇佣的员工在一个月内签 订劳动合同,同时给员工提供一份劳动合同。没有证据显示工厂是通过不公平的雇佣方式去减少其义务。但是在执行的过程当中还是存在以下差距:

10.1 - Labor contracts of employees were provided for review. However, no precarious employment requirement was not adequately fulfilled since not all the employees were covered by social insurance. Details please refer to PA5.

员工的劳动合同有提供。但是由于工厂没有给所有员工购买社保,无不稳定就业的要求没有完全达到。详情请参考PA5。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Type: Follow-up Audit

Audit Date: 06/07/2020

Performance Area 11: No Bonded Labour

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

Not rated

AREAS OF IMPROVEMENT:

Not rated 未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The auditee established policy and procedure to identify and prevent bonded labor. The verbal abuse, physical harassment, threat and violence were prohibited by the auditee. The employees' original identity cards were not retained and deposit was not required by the auditee. There was no bonded labor issue found in the audit.

被审核方建立了识别和防止强迫劳工的政策和程序。被审核方禁止言语虐待、肢体骚扰、威胁和暴力。被审核方不扣押员工的身份证原件和不收员工 押金。审核中没有发现强迫劳工的现象。

Remarks from Auditee

Performance Area 12: Protection of the Environment

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES:

None observed

AREAS OF IMPROVEMENT:

The factory obtained the Environment Impact Assessment (EIA) report, EIA approval and EPCA (Environment Protection Checking Acceptance). No industrial waste water was generated. The main waste air were kitchen fume, waste air from soldering and injection molding. Pollutant Discharge Permit was not available for the facility. The facility had finished pollutant discharge registration. 12.3 Corrected. The facility had

finished self-EPCA process and provided relevant records for review. 工厂获得了环境影响评价报告表, 环评批复,环保验收。无生产废水产生,主要废气为厨房油烟,注塑废气,焊锡废气。工厂不适用排污许可证. 工厂已办理固定源污染物排污登记。 12.3 已改善。工厂已完成环保自主验收并有提供相关记录查看。

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:06/08/2020

Good practices

None

Areas of improvement

The factory established the environment policy based on local law and BSCI standards. The factory provided environment protection knowledge training for workers. The environmental laws relevant to its business were identified and compiled. The factory properly managed its waste without dumping the waste material into the environment. Environmental impact report form and approval document of environment impact assessment were provided for review. However, gaps had been identified in implementation.

工厂基于当地法规和BSCI的标准建立了环境政策,工厂给员工提供了环境保护知识培训。工厂识别及收集了与经营活动相关的环保法律法规。采取 恰当的方式管理废弃物防止倾倒进环境。环境影响报告表和环境评估批复文件有提供审核。但是在执行的过程当中还是存在以下差距:

12.3 - Environmental impact report form and approval document of environment impact assessment were provided for review. However, the facility could not provide the environmental protection acceptance check report for their construction project for review. (PRC Measures for Administration of Environmental Protection Acceptance Check upon Completion of Construction Project article 17) 环境影响报告表和环境评估批复文件有提供审核。然而,工厂没有提供其建设项目竣工环境保护验收报告。

Remarks from Auditee





DBID: 351755 and Audit Id: 185632

Audit Type : Follow-up Audit

Audit Date: 06/07/2020

Performance Area 13: Ethical Business Behaviour

1- Followup Audit [Audit Id - 185632] Audit Date: 06/07/2020 PA Score: A

Deadline date:

GOOD PRACTICES: Not rated

AREAS OF IMPROVEMENT:

Not rated 未作评估

Remarks from Auditee:

Full Audit [Audit Id - 158997] Audit Date: 07/08/2019 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The auditee established ethical behavior policies and procedures. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context and provided integrity training to relevant personnel. The auditee had established the privacy protection procedure to collect, use and process employees' personal information. Based on workers interview, onsite observation and document review, the auditee provided consistent information during the audit. There was no non-ethical behavior observed during the audit.

被审核方建立了商业道德规范政策与程序。被审核方识别了最可能发生贪污、勒索或贿赂行为的情形和活动,对相关人员进行了诚信培训。被审核方 已建立了隐私保护程序收集、使用和处理个人信息。根据员工访谈,现场观察和文件评审,审核中被审核方提供了一致性的信息。审核中没发现不道

Remarks from Auditee





DBID: 351755 and Audit ld: 185632 Audit Type : Follow-up Audit

Audit Date : 06/07/2020

Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Follow-up Audit	06/07/2020	185632	D	A	A	A	A	D	A	A	A	Α	A	Α	A	С
Full Audit	07/08/2019	158997	D	A	A	A	В	D	A	Α	A	A	A	A	A	С



DBID: 351755 and Audit Id: 185632 Audit Type : Follow-up Audit

Audit Date : 06/07/2020

Producer Photos







hoto of fire safety equipment
mergency light and evacuation sign in stair.JPG













Photo of non-conformity











Photo of non-conformity



DBID: 351755 and Audit Id: 185632

Audit Type : Follow-up Audit





















Photo of the inside of the main production hall



