

Monitored Party Guangdong Roule Electronics Co., Ltd	amfori ID 156-010686-000	Address No.12, Pingdong 3rd Road, Nanping Industry Community, 519060 Zhuhai, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TÜV NORD CERT GmbH
Monitoring Start Date 11/09/2023	Closing Meeting Finished Date 14/09/2023	Submission Date 27/09/2023
Expiration Date 27/09/2025	Announcement Type Fully Announced	
Site GUANGDONG ROULE ELECTRONICS CO., LTD	Site amfori ID 156-010686-002	

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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	A	
PA 5: Fair Remuneration	A	
PA 6: Decent Working Hours	C	

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 Labour	A	
PA 12: Protection of the Environment	B	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Jack Dong; APSCA membership number: CSCA 21703843

Name of team auditor (if applicable): N/A; APSCA membership number: N/A

Name of observers, translators, trainees, advisors/consultants (if applicable): N/A

Monitoring partner name: TÜV NORD CERT GmbH (APSCA Firm Member: 11600051)

Audit schedule details: The audit is planned for 1 auditor x 2.5 days.

Business partner information: This is a fully announced full audit for Guangdong Roule Electronics Co., Ltd 广东柔乐电器有限公司 (914404007278748927), which was located at No.12, Pingdong 3rd Road, Nanping Industry Community, Zhuhai, Guangdong, China (中国广东珠海南屏科技工业园屏东三路12号). The factory was established on April 5, 2001 and its business operation validity was till September 25, 2023.

The factory specialized in the manufacture of building visual intercom system, villa visual, intercom doorbell, monitoring alarm system, alarm and wireless remote control doorbell. Its capacity was approximately 4000000 pieces per year. Production activities are mainly including molding, injection molding, SMT, silk printing, assembly and packing.

Audited location information: The auditee occupied one 5-storey production building and the 1/F, part of 2/F and the whole 4/F of one 6-storey dormitory building. The 1/F of the dormitory building was used as canteen and kitchen, the canteen operator rented floor from the auditee, operated the canteen individually and the canteen was open for all factories in the zone. Two rooms at second floor and the whole fourth floor of the dormitory building were used by auditee, other floors were leased to Zhuhai Duomingle New Energy Co., Ltd and the lease contract and its business license were also provided for review. All the buildings belonged to the auditee. The total construction areas used by factory were about 17500 square meters.

The 5-storey production building:

1/F: Molding, silk printing and injection molding;

2/F: Office and finished product warehouse;

3/F: Assembly and packing;

4/F: Material warehouse and SMT;

5/F: Boss's office and exhibition room;

Operating shifts and hours: According to management and provided time records from August 2022 to the audit day, there were 2 shifts in injection molding section, the day shift was from 8:00 to 12:00, 13:00 to 17:00 and 18:00 to 20:00 and the night shift was from 20:00 to 0:00, 1:00 to 5:00 and 6:00 to 8:00. Other production workers worked in one shift and their regular working hours were from 8:00 to 12:00 and 13:30 to 17:30. 2 regular overtime hours were conducted for 0 to 5 times a week and 8 rest day overtime hours on Saturday was also arranged generally. And the sample workers' maximum overtime hours were 2 hours a weekday, 8 hours a rest day, 18 hours a week and 76 hours a month in the sampled months. The most consecutive working days without rest were 6. As per factory management, there was no obvious peak production month in the factory.

Time recording system: IC card attendance system

Salary payment details: Payroll records of August 2022 to July 2023 were provided for review and 16 employees were selected as samples, it was noted that the minimum monthly wage of the sample workers was RMB 1900, which was equal to the local legal minimum monthly rate standard. The regular overtime hours and rest day overtime hours were paid at 150% and 200% of regular rate, respectively. Employees were paid by monthly rate at the end of each month for previous payment cycle by cash.

Worker number information: A total of 250 employees are currently working at the factory, which included 198 production employees (75 male workers plus 123 female workers) and 52 office employees. There are no vulnerable workers or interns, apprentices, contractor workers in the factory.

Worker organization details: There is no union established in factory, however, 3 worker representatives are elected by all employees on January 4, 2021.

Circumstances: The assessment process is smooth and the factory management is collaborative for the audit.

Summary of findings: The performance areas needed improvement are PA1, PA2, PA6, PA7 and PA12. There are 2 non-compliances in PA1, 1 non-compliance in PA2, 1 non-compliance in PA6, 3 non-compliances in PA7 and 1 non-compliance in PA12.

Remark

There was no contractor or agency used by the auditee, which makes the agency labour contract or contractor license/ permit not applicable; there was no collective bargaining agreements in the factory; the auditee did not obtain any government waivers.

SITE DETAILS

Site
**GUANGDONG ROULE
ELECTRONICS CO., LTD**

Site amfori ID
156-010686-002

GICS Classification

Sector
Information Technology

Industry Group
**Technology Hardware &
Equipment**

Industry
Communications Equipment

Sub Industry
Communications Equipment

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	250	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	2,482	Monthly
Calculated living wage in local currency	2,298	Monthly
Total sample	16	Workers

Other Metrics

Male workers	103	Workers
Female workers	147	Workers
Permanent workers - Male	103	Workers
Permanent workers - Female	147	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Management - Male	28	Workers
Management - Female	24	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers with night shift - Male	23	Workers
Workers with night shift - Female	9	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Domestic migrant workers - Male	74	Workers
Domestic migrant workers - Female	110	Workers
Foreign migrant workers - Male	0	Workers
Foreign migrant workers - Female	0	Workers
Workers hired directly - Male	103	Workers
Workers hired directly - Female	147	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Pregnant workers	0	Workers

Workers on parental leave - Male	0 Workers
Workers on parental leave - Female	0 Workers
Sample - Male	6 Workers
Sample - Female	10 Workers

FINDINGS



PA1: Social Management System

Site: GUANGDONG ROULE ELECTRONICS CO., LTD | Site amfori ID: 156-010686-002

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 worker interview and documents review, it was identified that the main auditee partially respected this principle because BSCI new Code was not carried out effectively, which resulted in the issues on management system, working hour, Remuneration, H&S, etc.	根据管理和工人访谈以及文件查阅，发现生产商部分遵守该原则，被审核方（生产商）BSCI新准则未得到有效执行，以致于工厂在管理系统、工时、福利以及健康安全等有问题。

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 interview and documents review, it was identified that the main auditee partially respects this principle because the factory had established the production capacity calculation procedure, but did not conduct the production capacity calculation to control the monthly overtime within 36 hours of legal requirements.	根据管理访谈和文件查阅，发现被审核方部分尊重该原则，因为虽然工厂建立了产能评估程序，但是工厂没有进行产能评估来确保月加班控制在合法要求的36小时之内。



PA 2: Workers Involvement and Protection

Site: GUANGDONG ROULE ELECTRONICS CO., LTD | Site amfori ID: 156-010686-002

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on management interview and documents review, it was identified that the factory established partial long term goals (such as health and safety and payment) to protect workers, but did not established a plan reflecting a step-by-step approach toward sustainable improvements. For	根据管理访谈和文件查阅，发现工厂建立了部分保护员工的目标（如健康安全和工资福利），但是未制订逐步可执行的计划以达到持续改善的情况。例如尽管工时方面在实际中和BSCI的要求有差距，但工厂没有制定相关的控制和目标。

Finding

example, there was gap on the working hours between the factory's practice and BSCI's requirement, but no any control and target was defined by factory.

PA 6: Decent Working Hours

Site: GUANGDONG ROULE ELECTRONICS CO., LTD | Site amfori ID: 156-010686-002

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 worker interview and 16 sample workers' time records, it was noted that 8 out of 16 selected workers' monthly overtime hours were 72 hours in July 2023 (latest payment month), 8 out of 16 selected workers' monthly overtime hours were 76 hours in March 2023 and 8 out of 16 selected workers' monthly overtime hours were 64 hours in September 2022, which exceeded legal overtime limit: 36 hours per month. Remark: The monthly overtime did not exceed 36 hours for other most unsampled months. (Reference law/regulation: PRC Labor Law article 41.)

审核发现根据工厂管理和工人访谈以及16名员工的考勤记录，2023年7月份(最近发薪月)抽样的16名员工中有8名的月加班时间为72小时，2023年3月抽样的16名员工中有8名的月加班时间为76小时和2022年9月抽样的16名员工中有8名的月加班时间为64小时，超过法定要求的月加班时间36小时。备注：过去12个月中其他未抽样的月份大部分未超36小时。(参照法规：《中华人民共和国劳动法》第41条)

PA 7: Occupational Health and Safety

Site: GUANGDONG ROULE ELECTRONICS CO., LTD | Site amfori ID: 156-010686-002

Question: 7.4 Is there satisfactory evidence of active cooperation between management and workers (and/or their representatives) when developing and implementing systems towards ensuring OHS?

ENGLISH

LOCAL LANGUAGE

Finding

The factory conducted health and safety risk assessment, but workers and their representative were not involved in health and safety risk assessment.

工厂进行了职业健康安全风险的评估，但工人和工人代表没有受邀参与进行职业健康安全风险的评估。

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	
Based on management interview and onsite observation, it was identified that some materials stored in the warehouse were placed against the wall. (Reference Law: Article 6.8 of General Rules for Fire safety Management of Storage Occupancies)	根据管理访谈和现场观察，发现工厂仓库堆放的部分物料靠墙堆放。(参考法规：《仓储场所消防安全管理通则》第6.8条)

Question: 7.25 Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination are adequate for the health and safety of workers?

ENGLISH	LOCAL LANGUAGE
Finding	
It was noted that the auditee installed hygromograph in workshops. However, the auditee did not set up the records to track the temperature in workshop was suit for the workers activities.	被审核方在车间安装了温湿度计，但是没有记录和追踪数据来确保员工工作环境的适宜性。

PA 12: Protection of the Environment

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Question: 12.4 Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on management interview and document review, it was identified that the auditee did not conduct regular monitoring for boundary noise or waste gas generated in the factory this year. The monitoring report of boundary noise and waste gas was expired on September 7, 2023, the factory management explained that they have signed the monitoring contract with the agency and plan to conduct the monitoring next weeks. (Reference law/regulation: General principles of technical guidelines for self-monitoring of sewage disposal units 5.4.2; PRC Law of Prevention and Control of Air Pollution, Article 24)	根据管理访谈和文件查阅，发现被审核方今年没有对厂内产生的厂界噪声和废气进行定期监测。上次报告于2023年9月7日到期，工厂解释他们已经跟服务商签订检测合同并计划接下来几周进行检测。 (参考法律法规：《排污单位自行监测技术指南总则5.4.2》；《中华人民共和国大气污染防治法》第24条)