



BUREAU VERITAS FACTORY ASSESSMENT REPORT (LEGO SYSTEM A/S)

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DO NOT DISCLOSE OUTSIDE YOUR ORGANISATION WITHOUT BUREAU VERITAS PRIOR WRITTEN CONSENT

Audit Results					
Total Compliance Level to Standard	Non Conformance(s)			Risk Level for Supply	Follow-up frequency
	Critical(s)	Major(s)	Minor(s)		
88.12%	0	1	22	ORANGE	NOT APPLICABLE

Audit Details	
BV Ref:	10193470987
Auditor:	JULIAN YAO
Audit Date:	JUL 13, 2020 - JUL 14, 2020
Partner Name:	RDP ASIA (SHENZHEN) LIMITED
Manufacturer Name:	Jia Ying (Hui Zhou) Umbrella Co., Ltd
Country:	CHINA

Scope of Audit
AGAINST LEGO_TIER1_HL & TOYS_FA_V01_01JAN2020

The above reflects our findings for the particular factory in concern on the date of our service only. This report does not certify, confirm or imply: a) compliance with any government, industry or association regulations or standards, unless stated otherwise; or, b) the quality of any specific products manufactured by the factory/sellers/suppliers; or, c) the shipment of any specific products. This report does not discharge or release the factory/sellers/suppliers from their commercial, legal or contractual obligations with buyers in respect of products manufactured by the factory/sellers/suppliers. Our services, including reports and certificates, are subject to the General Conditions of Service of Bureau Veritas which have been sent to your company. They can be resent upon written request. This report cannot be partially copied. Any reader other than the party for which this report has been specifically issued is hereby informed that the General Conditions of Service of Bureau Veritas contain liability limitation provisions.

BV Office Name: Bureau Veritas Shenzhen Company Limited Address: 3F, Block A, Min Li Da Industrial Bldg., 4th Area, Hong Hua Ling Industrial Area, Xili, Nanshan District, Shenzhen City, Guangdong Province. Country Name: China



(LEGO SYSTEM A/S)

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Performance Overview

Audit Details

BV Ref:	10193470987		
Auditor:	JULIAN YAO		
Audit Date:	JUL 13, 2020 - JUL 14, 2020		
Date of Previous Audit:	Jan 10, 2019		
Previous Audit #:	10183430115		
Vendor Name:	RDP ASIA (SHENZHEN) LIMITED		
Factory Name:	Jia Ying (Hui Zhou) Umbrella Co., Ltd		
Address:	DA HE GANG XINXU TOWN HUIYANG		
E-Mail Address:	PATRICK@SINOBEST.COM.HK		
Tel:	86-752-3332932	Fax: 86-752-3332290	
Country:	CHINA		

Scope of Audit

AGAINST LEGO_TIER1_HL & TOYS_FA_V01_01JAN2020

Audit Category

Umbrella

Key Personnel

Name	Job Title	Present at Audit (please tick 'X' below)			
		Opening Meeting	On-site Audit	Documentation Review	Closing Meeting
Mr. Hou Wencai	Plant Manager	x	x	x	x
Mr. Yu Zhenming	Quality manager	x	x	x	x
Mr. Tan Yufeng	Engineering Supervisor	x		x	x
Ms. He Xiaona	Production Supervisor	x	x	x	x

Audit Results

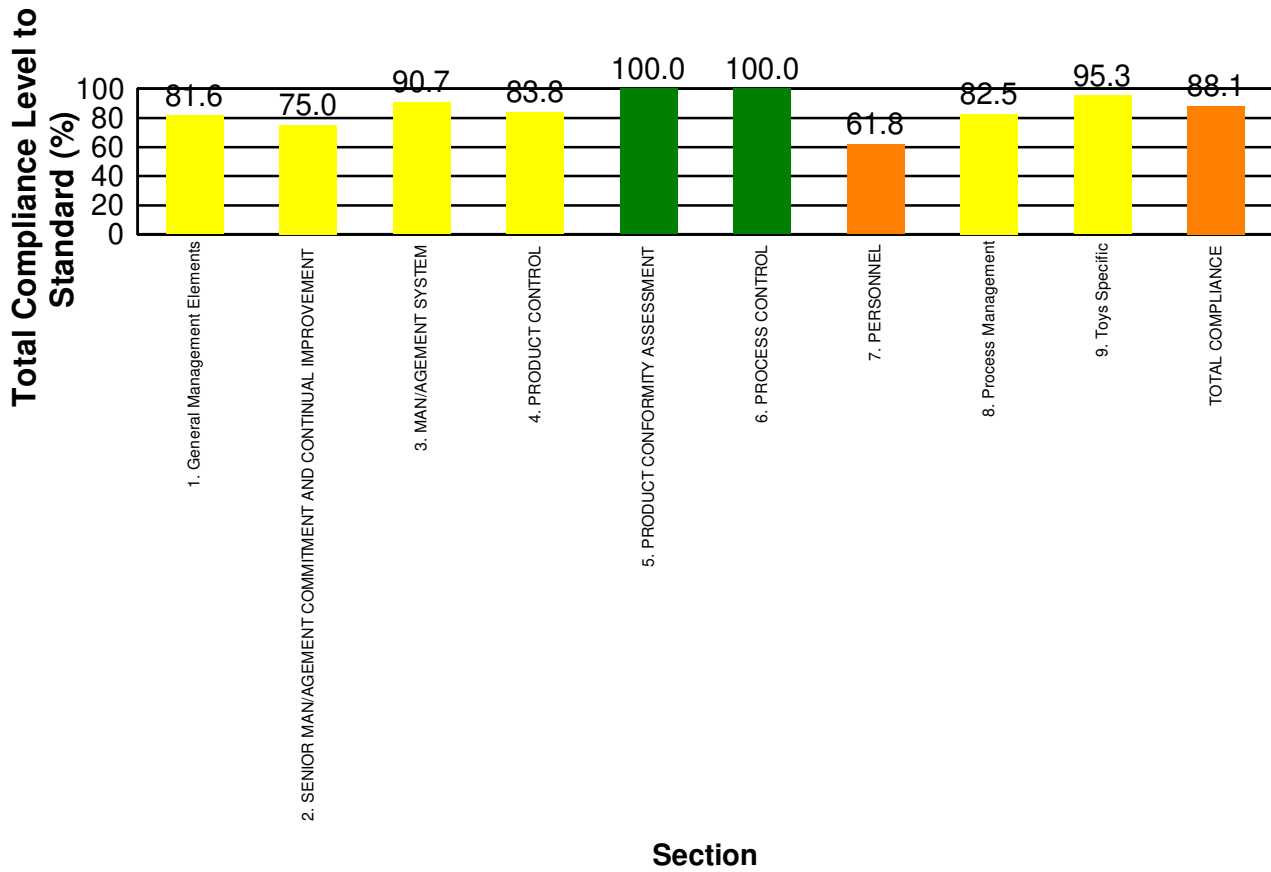
Total Compliance Level to Standard	Non Conformance(s)			Risk Level for Supply	Follow-up frequency
	Critical(s)	Major(s)	Minor(s)		
88.12%	0	1	22	ORANGE	NOT APPLICABLE

Company Profile

~Factory established: December 21, 2012 (shown on business license)
~Main manufacturing processes: Cutting, Sewing, Assembly(hand stitching) and packing, silk-screen printing process was subcontracted (subcontractor name: Huizhou Huaying Printing Co., Ltd, Address: Xinxu Town, Huiyang District, Huizhou City, Guangdong Province, China).
~Product Category: Umbrella
~Factory area: 5,000 square meters
~Employee number: 31 employees
~Production capacity: About 60,000 pieces per month, and lead time was about 45 ~ 60 days.
~International certification: Nil
~Peak season: Not obviously.
~Major market: United States(40%), Europe(40%), Asia(20%)
~Major customer: GAP, A.S Watson's, etc.
~Product liability insurance and product recall insurance were not purchased.
~Working days: 6 days per week, Monday to Saturday, Saturday was as overtime.
~Working shift: 1 shift (08:00-12:00, 13:30-17:30)

Analysis of Site Compliance

Audit Score Overview



NB: Total Compliance Color reflects "Risk level for supply"

Degree of compliance Overview (per section)

Section	Green	Yellow	Orange	Red	N/A	Total Questions
1. General Management Elements	13 (68.42%)	6 (31.58%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	19
2. Senior Man/Agement Commitment And Continual Improvement	2 (66.67%)	1 (33.33%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	3
3. Man/Agement System	21 (80.77%)	5 (19.23%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	26
4. Product Control	13 (76.47%)	4 (23.53%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	17
5. Product Conformity Assessment	8 (88.89%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	1 (11.11%)	9
6. Process Control	5 (100.00%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	0 (0.00%)	5
7. Personnel	3 (50.00%)	1 (16.67%)	1 (16.67%)	0 (0.00%)	1 (16.67%)	6
8. Process Management	6 (60.00%)	3 (30.00%)	0 (0.00%)	0 (0.00%)	1 (10.00%)	10
9. Toys Specific	28 (29.17%)	2 (2.08%)	0 (0.00%)	0 (0.00%)	66 (68.75%)	96
OVERALL	99 (51.83%)	22 (11.52%)	1 (0.52%)	0 (0.00%)	69	191 (100%)

Audit Findings Summary Critical Non-conformance Section

Clause No.	Clause Requirement	Levels of Non-Conformance	Audit Findings
NIL			

Please submit a corrective action plan within 14 days after the audit for the nonconformance's mentioned in the above and underneath sections.

Audit Findings Summary

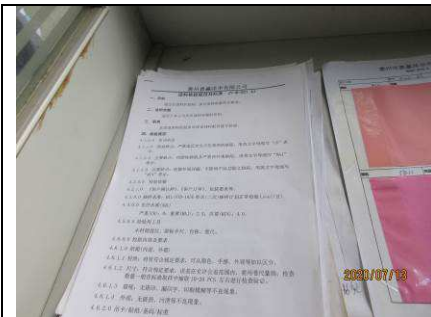
Clause No.	Clause Requirement	Levels of Non-Conformance	Audit Findings
1	General Management Elements		
1.1.1	Building exterior and interior shall be maintained in good conditions to prevent product contamination.	Minor (YELLOW)	Per manufacturer tour, most building exteriors and interiors were maintained in good condition, but the wall was peeling off was found in sewing workshop.
1.3.1	Premises are sufficiently illuminated in order to permit effective cleaning, production, monitoring, and inspection.	Minor (YELLOW)	The lighting was adequate in several sampled areas, such as 1,770 lux in IQC inspection area, 839 lux in sewing area, 1,447 lux in IPQC inspection station of sewing workshop, etc., however, the lighting was not adequate in some other areas, such as only 68 lux in incoming materials warehouse, 231 lux in packing area, 223 lux in final QC inspection area, 41 lux in finished products warehouse. For reference, lighting audit requirement should be 150 lux at least in warehouse, 550 lux at least in production area and 750 lux at least in inspection area.
1.4.1	Cleaning practices shall be completed so as to minimize risk of contamination.	Minor (YELLOW)	The manufacturer established cleaning procedure and kept relevant cleaning records, most working areas were kept clean during this audit, but several tapes were found in the working tables of packing areas.
1.4.2	All cleaning equipment in all areas are located such that contamination of process, storage, packing, and flow areas is prevented.	Minor (YELLOW)	The manufacturer had designated cleaning equipment storage area, most cleaning equipment were properly stored, but two cleaning equipment were placed closely with incoming materials in incoming materials warehouse but not placed into the designated areas.
1.5.1	The company shall either contract the services of a competent pest control organization, or shall have trained personnel, for the regular inspection and treatment of premises to deter and eradicate infestation. Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.	Minor (YELLOW)	The manufacturer had established pest control procedure, pest killing records were available, however, it was found that the used chemicals for pest control were not indicated on pest killing records.
1.5.3	Pest activity report with corrective actions shall be completed and satisfactorily verified.	Minor (YELLOW)	No pest activity report with corrective actions were available in the factory and no evidence was available to prove that the manufacturer conducted pest activity analysis.
2	SENIOR MAN/AGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT		
2.3	"Quality Improvement Process is in-place. Daily quality review meetings with action plans developed and implemented. Representatives of Production, Equipment AND Machinery Maintenance, and Operator Training departments regularly attend the meetings." "	Minor (YELLOW)	The manufacturer did not establish daily quality improvement process, no daily quality review meeting record was available to show that quality department, production department, equipment& machinery maintenance department etc. were attended to discuss and solve the quality issue for quality improvement. For reference, the manufacturer would conduct quality meeting attended by each department once per month, but not all the meeting records were kept.

3	MAN/AGEMENT SYSTEM		
3.2.2	The policy shall be communicated throughout the company, and regularly reviewed.	Minor (YELLOW)	The manufacturer established quality policy, it was posted in sewing workshop, but based on interview, 2 of 5 selected employees did not know the quality policy.
3.3.1	The company shall define and communicate the levels of responsibility and accountability for staff involved with product safety, legality, and quality.	Minor (YELLOW)	The manufacturer established the job descriptions which include the levels of responsibility and accountability for staff involved with product safety legality and quality, but no records were available to prove that the job descriptions were communicated to relevant employees, based on interview, the employee knew her job description.
3.3.2	There shall be appropriate arrangements in place, to cover for the absence of key staff.	Minor (YELLOW)	The manufacturer established procedure on the arrangement for back-ups of some key staffs, but no updated back-up name list showed name of key staff's back-up persons. From interview of QC inspectors, the quality supervisor would act for her responsibility during her absence.
3.8.2	Raw materials (including packaging), work in progress and finished products shall be identified to ensure traceability.	Minor (YELLOW)	The manufacturer established product identification and traceability control procedure, per manufacturer tour, most sampled materials, semi-finished products and finished products were properly identified, but a few part of surplus fabric materials in incoming materials warehouse were not identified with lot number, incoming date, etc. to ensure traceability.
3.11.2	All documents in use are the correct version.	Minor (YELLOW)	The manufacturer established document control procedure, most documents were controlled with version number and used in correct order, but the sample list was not controlled with version number.
4	PRODUCT CONTROL		
4.2.4	All chemicals are segregated during storage and separated from raw materials and finished products by a physical barrier.	Minor (YELLOW)	The manufacturer established chemical materials control procedure, all of them were properly segregated from materials/products, but one chemical container was not identified in the packing workshop.
4.3.1	Procedures shall be in place at storage and production areas to prevent cross contamination and misuse of raw materials, packaging and finished products.	Minor (YELLOW)	The manufacturer had established procedure to prevent the contamination of raw materials, packaging and finished products, and per manufacturer tour, most sampled materials and products were properly stored, but a few part of packing materials were directly placed onto floor in packing area, which may lead to the material contamination.
4.3.3	Materials and products are used following a FIFO policy or based on its shelf life.	Minor (YELLOW)	The manufacturer had established warehouse management instruction to state the FIFO requirement, and per manufacturer tour, most incoming materials and products were properly identified with incoming date, production date or expiry date to ensure the FIFO & shelf life, however, it was found that a few part of surplus fabric materials in incoming materials warehouse was not identified with incoming date to ensure FIFO.
4.5.1	The company shall establish procedures for the identification, segregation, investigation and disposition of non-conforming raw materials (including packaging), work-in-progress and finished products. Disposition of finished products shall be per any applicable customer requirements.	Minor (YELLOW)	The manufacturer established non-conforming materials handling procedure, most non-conforming materials/products were properly identified and segregated, but a few part of non-conforming semi-finished products were not identified with reject reason, quantity, date, etc. in the reject area of sewing workshop.

7	PERSONNEL		
7.1.1	Procedure shall be in place and implemented to ensure that all personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and when any procedure or process changes occur.	Major (ORANGE)	The manufacturer established training procedure, training plan, most workers were suitably trained, relevant records were kept, but no training record was available for one new employee in packing workshop.
7.1.3	The inspectors shall be trained in the use of the inspection schedule, sampling plan and inspection criteria for the components and semi-finished product being assessed.	Minor (YELLOW)	The factory conducted training to all inspectors in the use of the inspection schedule, sampling plan and inspection criteria, relevant records were kept, but based on interview, one of the IQC inspectors was not familiar with the sampling plan and inspection criteria she used.
8	Process Management		
8.2.3	The safety or legality of products are not jeopardised during maintenance operations.	Minor (YELLOW)	The manufacturer did not establish procedures to ensure the safety or legality of products were not jeopardised during maintenance operations, for reference, no maintenance operations were observed on site during manufacturer tour, based on the interview, the employee stated that materials and products would be removed when maintenance operations were performed.
8.2.4	Procedures shall be in place for process / equipment changeover.	Minor (YELLOW)	The manufacturer established procedure for process/equipment changeover, based on interview, the employees knew the requirements, but not all of the records were kept.
8.3.2.2	A duplicate of an approved production sample with comments shall be provided and in use for all necessary operations as reference for operators.	Minor (YELLOW)	The manufacturer provided approved samples in most working areas, but one of the samples was not signed in sewing workshop.
9	Toys Specific		
9.6.7	Cut panel replacement procedures shall be in place to replace defective panels with fabric from the same dye lot or shade.	Minor (YELLOW)	The manufacturer established cut panel replacement procedures, relevant records were kept, but the records were not fully filled, no fabric lot number was filled in the record.
9.19.2	Defective and overrun products shall be handled as per defined instruction.	Minor (YELLOW)	The manufacturer established procedure to handle the defective and overrun products, but no relevant handling records were kept.

Digital Photo Records

		
<p>1) Factory entrance</p>	<p>2) Factory name at entrance</p>	<p>3) Similar products produced for the client</p>
		
<p>4) Incoming materials warehouse</p>	<p>5) Finished products storage area</p>	<p>6) Chemical materials storage area</p>
		
<p>7) MSDS posted</p>	<p>8) Cutting area</p>	<p>9) Sewing area</p>
		
<p>10) Assembly area(hand stitching)</p>	<p>11) Packing area</p>	<p>12) IQC inspection area</p>



13) IQC inspection instruction on site



14) Fabric inspection machine



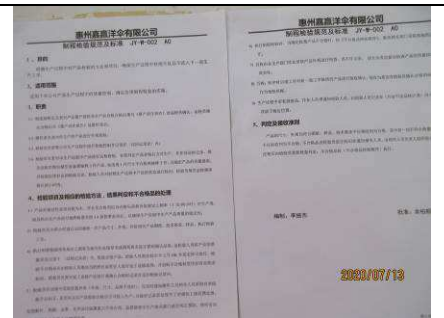
15) Inspection instruction for fabric inspection



16) Puncher and weight



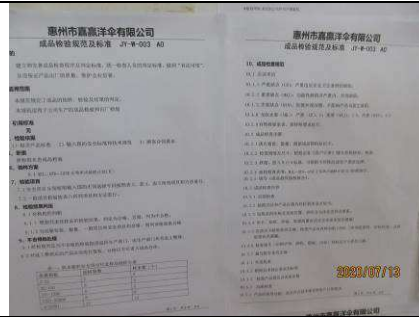
17) IPQC inspection area



18) Inspection instruction on site



19) Final inspection and testing area



20) Final inspection instruction on site



21) Pull tester



22) Color fastness tester



23) Temperature tester



24) Testing instruction on site



25) Light box



26) Light source



27) Calibration label



28) Working instruction on site



29) Approved sample on site



30) Sharp tool was fastened



31) Broken needle records



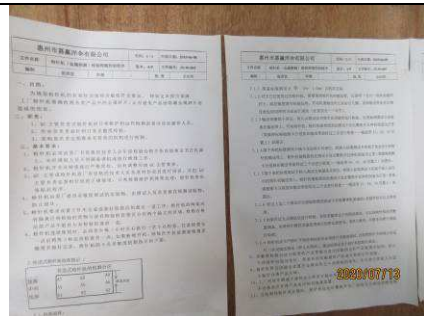
32) Metal detector



33) Quarantine box in metal detection area



34) Calibration card



35) Working instruction for metal detector



36) Calibration label for metal detector

Table with columns for date, time, and various calibration points. The table is filled with handwritten data and has a date stamp of 2020/07/13.

37) Daily 9 points calibration records

Table titled '针针检测记录' (Needle Detection Record) with columns for item name, quantity, and detection results. It includes a date stamp of 2020/07/13.

38) Metal detection records



39) Rejected materials storage area



40) Pest killing device



41) Mouse trap



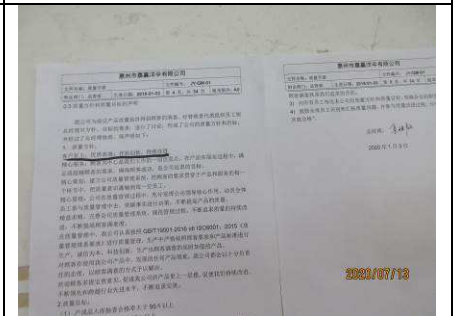
42) Designated drinking area



43) Humidity and temperature monitor

Table titled '惠州嘉赢洋伞有限公司 机修设备维护记录' (Maintenance Record for Jia Ying Umbrella Co., Ltd. Machine Tools). It contains a grid for recording maintenance activities.

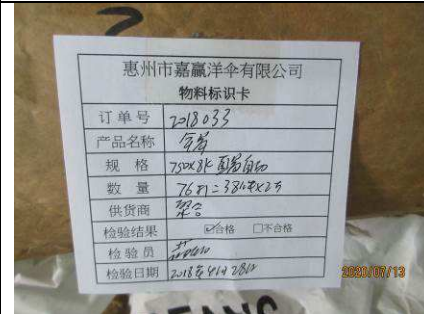
44) Maintenance records



45) Quality policy was posted



46) Cleaning tools storage area





47) Identification label



48) Adequate lighting in IQC inspection area(1770 lux)

		
<p>49) Adequate lighting in sewing area(839 lux)</p>	<p>50) Adequate lighting in IPQC inspection area of sewing workshop(1447 lux)</p>	<p>51) NC- 1.1 Wall was peeling off in sewing workshop</p>
		
<p>52) NC-1.3.1- Insufficient lighting (68 lux) in incoming materials warehouse</p>	<p>53) NC- 1.3.1- Insufficient lighting (223 lux) in final QC inspection area</p>	<p>54) NC-1.3.1- Insufficient lighting (231 lux) in packing area</p>
		
<p>55) NC-1.3.1- Insufficient lighting (41 lux) in finished products storage area</p>	<p>56) NC-1.4.1 Tape was found in working table of packing areas</p>	<p>57) NC-1.4.2 Two cleaning equipment were placed closely with incoming materials in incoming materials warehouse</p>
		
<p>58) NC-3.8.2 & 4.3.3 A few part of surplus fabric materials were not identified with incoming date, lot number, etc. in incoming materials warehouse</p>	<p>59) NC-4.2.4 One chemical container was not identified in packing workshop</p>	<p>60) NC-4.3.1- A few part of packing materials were directly placed onto floor in packing area</p>

		<p>Nil</p>
<p>61) NC-4.5.1 A few part of non-conforming semi-finished products were not identified with reject reason, quantity, date, etc. in the reject area of sewing workshop.</p>	<p>62) NC-8.3.2.2 One sample was not signed in sewing workshop</p>	<p>63)</p>

Business license


营 业 执 照
(副 本) (副本号:1-1)
统一社会信用代码91441303059915969G


名 称	惠州市嘉赢洋伞有限公司
类 型	有限责任公司(台港澳法人独资)
住 所	惠阳区新圩镇新联村打禾岗小组
法定代表人	黄静雅
注册 资 本	捌佰万元人民币
成 立 日 期	2012年12月21日
营 业 期 限	2012年12月21日 至 2046年12月26日
经 营 范 围	生产和销售: 洋伞及雨具(涉及行业许可管理的, 按国家规定办理)。(依法须经批准的项目, 经相关部门批准后方可开展经营活动。) 〰

2020/07/13 

登 记 机 关 

2016 年 12 月 26 日

企业信用信息公示系统网址: <http://gsxt.gdgs.gov.cn/> 中华人民共和国国家工商行政管理总局监制

	<p>CODE OF CONDUCT (page 1)</p> <p>INSPECTION, AUDIT & ASSESSMENT</p> <p>Factory Integrity Acknowledgment</p>	<p>Bureau Veritas Consumer Products Services Pvt Ltd, 7F Octa Tower, 8 Lam Chak Street, Kowloon Bay, Kowloon, Hong Kong.</p> <p>Tel: +852 2418 1222 www.cps.bureauveritas.com</p>
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Inspection / Audit No.:	
Factory / Supplier:	
Inspection / Audit Date:	

Dear Supplier,
Bureau Veritas, Consumer Products Services Division provides independent, impartial and objective assessment and inspection services for our global clientele. Our assessment and/or inspection findings will be duly recorded and reported to our clients. We request your cooperation to enable us to effectively execute this process.

We operate a strict Code of Ethics, which prohibits the direct or indirect acceptance of gifts, payment or benefit in any form. This Code of Conduct letter is presented to the management of your facility for the purpose of setting out acceptable conduct whilst our representatives perform their job at your facility. We ask that you read this document and sign it to confirm your understanding and agreement.

1. Never, under any circumstances, give in to demands or requests for benefits or payments from a BV representative. If a BV representative asks for any direct or indirect benefit, you must contact the BV office or the contact details below. You must also contact BV immediately for any other issues or concerns on the BV representative/s assigned for the service.
2. Never, under any circumstances, collude or offer a facilitation payment, bribe, gift or any other benefit to a BV representative. Any benefit given to a BV representative will be construed as a corrupt practice and will be reported to our client. This includes "tea money", "hardship appreciation", or any other benefits regardless of the actual value.
3. BV is committed to fully complying with local laws and regulations, including such on anti-corruption and bribery. Where appropriate, BV will not hesitate to alert or cooperate with law enforcement authorities on suspected or actual offenses.
4. Do not put any undue pressure on our representatives to execute their work if conditions stipulated by the client are not met. Also, do not put any undue pressure on our representatives to amend the results or recording of their findings.
5. During the work execution, our representatives may be required to take photos of the factory facilities, products being inspected or assessment/inspection processes in order to validate findings. Please ensure this process is not obstructed. Documents, pictures, or any other information gathered during the course of the BV service will be kept confidential.
6. Provide a safe environment that allows BV representatives to do their job properly. This may mean assistance with locating, moving and opening cartons for inspections and arranging a private and suitable place for audits. It also means pointing out any safety hazards, and providing appropriate personal protective equipment and necessary training regarding any risk that may be encountered. BV representatives will check the working environment in accordance with BV's safety requirements in the "2 Minutes for my safety assessment form". In case potential risks are identified, which may jeopardize auditors' and inspectors' health or safety, they have the right to discontinue the services if you cannot eliminate such risks.
7. We require factory to assign only authorized personnel to be present in the inspection / audit room to coordinate during BV services, so that there is no overcrowding. After completion of the service, the findings will be discussed only once and therefore factory should arrange their authorized personnel to be present during the closing meeting.
8. We require only authorized factory representative to sign the report prepared by our representatives to acknowledge the execution of their work and findings.
9. In some cases we are asked by client to submit hand written reports and digital images from the factory and would request that our representatives use your facilities. With regards to inspections, our representatives will request to take shipment samples for verification.
10. Trainee(s) may accompany senior inspectors /auditors on the visit to your factory. If needed, an interpreter may also accompany the BV representative. Their presence will neither result in additional charges to you, nor affect the final results.
11. To enforce our integrity policy, we may send mystery inspectors/auditors to perform services or other BV representatives to perform surprise checks and report to our client any breach of the policy.

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	<p style="text-align: center;">CODE OF CONDUCT (page 2)</p> <p style="text-align: center;">INSPECTION, AUDIT & ASSESSMENT</p> <p style="text-align: center;">Factory Integrity Acknowledgment</p>	<p>Bureau Veritas Consumer Products Services Pvt Ltd, 7F Octa Tower, 8 Lam Chak Street, Kowloon Bay, Kowloon, Hong Kong.</p> <p style="text-align: right;">Tel: +852 2418 1222 www.cps.bureauveritas.com</p>
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PART 1: Factory declaration (To be filled by the factory once BV COC is explained by the BV staff).

We confirm that we received the BV Code of Conduct and that the contents were explained by the BV representative, Mr. / Ms. _____ on DDMMYY at HH:MM and we understand the contents, spirit and intent of the BV procedure on Integrity. The following BV representatives performed the service: _____.

Signature of Factory Representative

Factory Representative's contact number

PART 2: Factory declaration (To be filled by the factory after completion of the service. In case there is anything to declare confidentially, specific details can be sent directly to ethics@hk.bureauveritas.com).

Item	Please declare if benefits were offered to the BV staff ✓	Yes	No	Item	Please declare if benefits were offered to the BV staff ✓	Yes	No
A	Meals	<input type="checkbox"/>	<input type="checkbox"/>	B	Transportation	<input type="checkbox"/>	<input type="checkbox"/>
C	Accommodation	<input type="checkbox"/>	<input type="checkbox"/>	D	Money	<input type="checkbox"/>	<input type="checkbox"/>
E	Gifts	<input type="checkbox"/>	<input type="checkbox"/>	F	Other Benefits/Favors	<input type="checkbox"/>	<input type="checkbox"/>
Explain details of free or subsidized benefits offered							
G	Please declare about use/role of consultants ✓	Yes	No	Explain details of the consultant			
Were you contacted by a consultant for this inspection/audit?		<input type="checkbox"/>	<input type="checkbox"/>	If yes, please specify when, who and why.			
Have you used a consultant's services for this inspection/audit?		<input type="checkbox"/>	<input type="checkbox"/>	If yes, please specify when, who and why.			

We acknowledge that the above information is true and accurate. We understand that BV could and will report to program clients and/or law enforcement authorities any suspected improprieties or illegal activities.

We also acknowledge that the BV representative/s explained the findings of the service and we agree with it.

Signature of Factory Representative

Name and Designation

Date and Time

Company Chop

Please contact the following to make any complaints or suggestions:

Complaints mailbox: Ethics@hk.bureauveritas.com

Jamey Appler Tel: +1 716 505 3582
Vice President & CPS General Counsel, Email: jamey.appler@us.bureauveritas.com
Risk and Compliance Officer

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SD002_CODE_OF_CONDUCT_LETTER(EN)_GLOBAL_VERSION 03_23MAR2020

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行为守则 (第1页)

INSPECTION, AUDIT & ASSESSMENT

工厂廉政确认书

Bureau Veritas Consumer Products Services Pvt Ltd,
7F Octa Tower, 8 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong

Tel: +852 2418 1222
www.cps.bureauveritas.com

检验/审核号码:	10193470987
厂商:	Jia Ying (Huizhou) Umbrella Co., Ltd
检验/审核日期:	July 13 to 14, 2020

尊敬的厂商,

必维国际检验集团消费品服务事业部 (以下简称 BV) 致力于为全球客户提供独立、公正客观的各类评估和检验服务, 如实记录并向客户汇报评估及检验过程中的各种发现。为确保整个工作过程的有效进行, 请您给予最好的合作。

BV 实施一套严格的道德行为规范, 禁止员工直接或间接接受任何形式的礼物、报酬或好处。本行为守则呈递给贵公司管理层以告知 BV 代表在贵公司执行工作期间的行为规范。请阅读此文件并签名、盖章以确认您的理解和同意。

- 任何情形下, 遇到 BV 代表索要任何直接或间接形式的报酬或好处时, 均不予理会并按以下联络方式直接联系 BV 办公室。如有其他与执行工作的 BV 代表相关的问题或关注, 也请立即联系 BV 公司。
- 任何情形下, 不串通不贿赂 BV 的代表, 不提供任何报酬、礼物或其他形式的好处给 BV 的代表。BV 将按行贿处理并向客户汇报厂商给予 BV 代表任何好处的行为, 包括茶水费、辛苦费、感谢费或其他形式的好处, 无论实际价值多少。
- BV 一贯遵守当地的法律法规, 包括遵守相关反腐败及反商业贿赂方面的法律法规。对于可疑的或实际的违法行为, BV 将汇报给当地执法部门或与其合作进行调查。
- 在没有达到客户要求的检验和/或评估条件时, 不对 BV 代表施加任何不合适的影响或者压力。不对 BV 代表施加任何不适当的影响或者压力去试图修改任何报告结果或记录。
- 为证实评估或者检验的工作发现, BV 代表在执行工作时将根据需要对工厂的设施、检验的产品或评估/检验的各个过程进行拍照。请确保不阻碍拍照过程的正常进行。BV 将对执行工作过程中收集的文件、图片及其它信息严格地保密。
- 提供良好、安全的工作环境使 BV 代表得以顺利地工作。例如, 产品检验时, 请协助确定待检产品的位置及搬运和开箱等工作; 对于工厂评估, 提供合适安全的工作场所进行员工面谈工作; 同时告知危险因素并提供合适的个人防护设备 (PPE), 对可能遇到的危险提供必要的培训。按照 BV 的安全要求“2 分钟的安全检查表”, BV 代表将检查检验和评估的工作环境。如果发现有任何可能对检验员和审核员安全和健康造成的隐患, 且工厂无法排除这些隐患时, BV 代表有权中止服务。
- 我们请求厂方只派遣授权代表在检验/审核地点配合 BV 工作, 以免造成拥挤。工作完成后, 发现的问题只讨论一次, 因此请厂方安排授权代表参加末次会议。
- BV 代表写完报告后, 请厂方授权代表在报告上签字以确认知晓 BV 代表的工作的进展情况和结果发现等。某些情况下, 客户要求 BV 代表需要直接从工厂将手写报告和数码照片传出, 请给予此方面的协助。
- 产品检验工作完成后, BV 代表会要求取走一些出货样品以便日后参考。
- 我们会安排见习职员跟随资深职员到工厂访问。根据需要, 翻译人员也会陪同到访。但这种安排既不会产生额外的人工费也不会影响到检验的最终结果。
- 为贯彻 BV 廉政政策, 我们可能会派出特殊检验/评估人员来执行工作或派其他 BV 代表来检查工作, 所有工厂违反政策的行为将被呈报给客户。

2020/07/14



行为守则 (第2页)

INSPECTION, AUDIT & ASSESSMENT

工厂廉政确认书

Bureau Veritas Consumer Products Services Pvt Ltd,
7F Octa Tower, 8 Lam Chak Street,
Kowloon Bay, Kowloon, Hong Kong

Tel: +852 2418 1222
www.cps.bureauveritas.com

第一部分：工厂声明 (BV代表解释行为守则后由工厂填写)：
我们在此声明，已经收到BV的行为守则，并由BV代表 James 先生/女士于(日期) 2020年7月13至14日 向我们解释了其内容，我们已阅读和理解以上内容，以及清楚BV廉政措施的精神和目的。来执行工作的BV代表如下：

姚国亮

何山
工厂代表签名

052-2332932
工厂代表联系电话

第二部分：工厂声明 (工作完成后由工厂填写。如机密信息需报告，可将详细信息直接发至邮箱 ethics@hk.bureauveritas.com)：

项目	请声明是否提供下列好处给 BV 代表 ✓	是	否	项目	请声明是否提供下列好处给 BV 代表 ✓	是	否
A	膳食	<input type="checkbox"/>	<input type="checkbox"/>	B	交通	<input type="checkbox"/>	<input checked="" type="checkbox"/>
C	住宿	<input type="checkbox"/>	<input checked="" type="checkbox"/>	D	金钱	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E	礼物	<input type="checkbox"/>	<input checked="" type="checkbox"/>	F	其它好处	<input type="checkbox"/>	<input checked="" type="checkbox"/>
详细说明免费或有偿提供相关好处的情况							
G	关于咨询公司的声明 ✓	是	否	详细说明咨询公司的情况			
关于本次检验/审核，是否有咨询公司联系贵公司？							
关于本次检验/审核，贵公司是否使用了咨询公司的服务？							

我们在此声明，以上信息是真实准确的，我们理解BV可向客户或当地执法部门汇报疑似违规或违法行为。
同时，BV代表向我们解释了工作中发现的问题，并且我们认同这些问题。

何山
工厂代表签名

何山 生产部
工厂代表姓名和职位

2020.7.13
时间和日期



关于投诉或建议，请联系：

廉政投诉邮箱：Ethics@hk.bureauveritas.com

Jamey Appler
副总裁兼消费品事业部
法律总顾问、风险及合规官

电话：+1 716 505 3582
电邮：jamey.appler@us.bureauveritas.com