

Auditee :

**GEOTEGRITY ECO PACK (XIAMEN) CO., LTD.**

Audit Date From :

**31/03/2021**

Audit Date To :

**02/04/2021**

Expiry Date of the Audit :

**Please refer to the producer profile in the amfori BSCI platform**

Auditing Company :

**TUEV Rheinland**

Auditor's Name(s) :

**Sam Li(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.  
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### Rating Definitions

Rating	A combination of ratings per Performance Area where:	Consequence																																																
<b>A Very Good</b>	<ul style="list-style-type: none"> <li>• Minimum 7 Performance Areas rated A</li> <li>• No Performance Areas rated C, D or E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	B	B	B	B	B	B	A	A	A	A	A	A	A	A	A	B	B	B	B	B	B	B	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
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<b>B Good</b>	<ul style="list-style-type: none"> <li>• Maximum 3 Performance Areas rated C</li> <li>• No Performance Areas rated D or E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td></tr> <tr><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> </table>	A	A	A	A	A	A	B	B	B	B	B	B	B	B	B	B	A	A	A	A	A	B	B	B	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	B	B	C	C	C	C	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
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<b>C Acceptable</b>	<ul style="list-style-type: none"> <li>• Maximum 2 Performance Areas rated D</li> <li>• No Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td></tr> <tr><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td></tr> </table>	A	A	A	A	A	A	A	A	A	C	C	C	C	C	C	C	A	A	A	A	B	B	B	B	B	C	C	C	C	D	D	D	C	C	C	C	C	C	C	C	C	C	C	C	C	C	D	D	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
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<b>D Insufficient</b>	<ul style="list-style-type: none"> <li>• Maximum 6 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td></tr> <tr><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td></tr> <tr><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	D	A	A	A	B	B	B	C	C	C	D	D	D	D	D	D	E	D	D	D	D	D	D	D	D	D	E	E	E	E	E	E	E	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
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<b>E Unacceptable</b>	<ul style="list-style-type: none"> <li>• Minimum 7 Performance Areas rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>A</td><td>A</td><td>B</td><td>B</td><td>C</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> <tr><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	E	E	E	E	E	E	E	E	E	E	A	A	B	B	C	D	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
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<b>Zero Tolerance</b>	<b>A Zero Tolerance issue was identified [see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol]</b>	<b>Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.</b>																																																



### Main Auditee Information

Name of producer :	<b>GEOTEGRITY ECO PACK (XIAMEN) CO., LTD.</b>		
DBID number :	<b>331189</b>		
Audit ID :	<b>207321</b>		
Address :	<b>No.523, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen</b>		
Province :	<b>Fujian</b>	Country :	<b>China</b>
Management Representative :	<b>Jianfu Su</b>		
Contact person:	<b>Jianfu Su</b>	Sector :	<b>Non-Food</b>
Industry Type :	<b>Construction</b>	Product group :	<b>Kitchen merchandise</b>
Product Type :	<b>Disposable Pulp Environment-friendly Tableware</b>		



### Audit Details

Audit Range :	<input checked="" type="checkbox"/> <b>Full Audit</b>	<input type="checkbox"/> <b>Follow-up Audit</b>
Audit Scope :	<input checked="" type="checkbox"/> <b>Main Auditee</b>	<input type="checkbox"/> <b>Main Auditee &amp; Farms</b>
Audit Environment :	<input checked="" type="checkbox"/> <b>Industrial</b>	<input type="checkbox"/> <b>Agricultural</b>
Audit Announcement :	<input type="checkbox"/> <b>Fully-Announced</b>	<input type="checkbox"/> <b>Fully-Unannounced</b>
Random Unannounced Check (RUC) :	<b>No</b>	
Audit extent (if applicable) :	<b>none</b>	
Audit interferences or contingencies (if applicable) :	<b>none</b>	
Overall rating :	<b>C</b>	
Need of follow-up :	<b>Yes</b>	If YES, by : <b>02/04/2022</b>

### 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
<b>D</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>A</b>	<b>D</b>	<b>A</b>						

### Executive summary of audit report

GEOTEGRITY ECO PACK (XIAMEN) CO., LTD. (吉特利环保科技(厦门)有限公司) was located at No.523, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen City (厦门市同安区同安工业集中区集安路523号).

The auditee owned the property right of all buildings within the factory boundary. The auditee covered an area around 100000 square meters. For the previous amfori BSCI audit in March 2020, there were 14 buildings in the factory boundary: six flat production buildings (No.523, No.525, No.527, No.529, No.531, No.533 buildings), two 4-storey production and warehouse buildings (No. 521, 537 buildings), three canteen and dormitory buildings (No.513, No.515, No.517 buildings), one 6-storey office building (No.519 building), one flat security building (No.539 building) and one flat boiler building (No.535 building).

During current audit process, as per site tour, the auditee newly built 2 buildings (no building numbers) since October 2020. One was flat production building and used by one machinery company A. Another was 3-storey building and still under construction. As per the management interview, this 3-storey building was planning used as warehouse of auditee.

The building No.521 was used by company B, which produced paper products. As per site tour, workers and management interview, company A and B both had independent business license. No worker or management sharing were detected. Thus, the current audit scope only covered above mentioned 13 buildings without No.521.

The main product was Disposable Pulp Environment-friendly Tableware. The main processes were pulping, shaping, cutting, Inspection and packing. As per management interview and document review, no obvious peak season was presented in the auditee. No contractor or agency labor used by factory. The security guards, boiler workers and kitchen workers were subcontracted from other companies.

Private interview was conducted in the facility with 25 workers selected from different departments. The time records were cross checked against with production records and no inconsistency regarding working hours was found. All interviewed employees had positive attitudes toward the factory management.

The management was cooperative throughout the whole audit, all the area could be accessed and taking photos was allowed. Opening and closing meeting were held with the factory representatives and worker representatives. All of the findings were discussed in the closing meeting. Finally, Mr. Jianfu Su/Factory Director signed the onsite CAP and agreed to take corrective actions.

#### Remark:

1. auditor APSCA information for this audit: Sam Li, CSCA 21702578.
2. No Comprehensive Working Hour System waiver or social insurance waiver obtained by factory.
3. The address stated in business license was No.523, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen City. However, the auditee actually physical address was No.513/515/517/519/523/525/527/529/531/533/535/537/539, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen City. The auditee did not update their business license and finding raised in PA13.2. The auditee used No.517 registered company C, which was investment company without production. The auditee used No.529 registered company A, which located at the newly built flat production building and produced machinery products. The auditee used No. 531 registered company D, which was electronic commerce company without production. Above 3 companies were not in the audit scope.



## Ratings Summary

Auditee's background information			
Auditee's name :	<b>GEOTEGRITY ECO PACK (XIAMEN) CO., LTD.</b>	Legal status :	<b>Limited company</b>
Local Name :	吉特利环保科技(厦门)有限公司 (91350200575036784U)	Year in which the auditee was founded :	<b>2011</b>
Address :	<b>No.523, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District,</b>	Contact person (please select) :	<b>Jianfu Su</b>
Province :	<b>Fujian</b>	Contact's Email :	<b>bonnie.chen@geotegrity.com</b>
City :	<b>Xiamen</b>	Auditee's official language(s) for written communications :	<b>Chinese</b>
Region :	<b>North East Asia</b>	Other relevant languages for the auditee :	<b>N/A</b>
Country :	<b>China</b>	Website of auditee (if applicable) :	<b>www.geotegrity.com</b>
GPS coordinates :	<b>E:118°7'25", N:24°42'28"</b>	Total turnover (in Euros) :	<b>40000000.00</b>
Sector :	<b>Non-Food</b>	Of which exports % :	<b>95.00</b>
Industry :	<b>Construction</b>	Of which domestic market % :	<b>5.00</b>
If other, please specify :		Production volume :	<b>20000 tons per year</b>
Product Group :	<b>Kitchen merchandise</b>	Production cost calculation :	<b>Yes</b>
If other, please specify :		Lost time injury calculation cost :	<b>Yes</b>
Product Type :	<b>Disposable Pulp Environment-friendly Tableware</b>		

Auditee's employment structure at the time of the audit			
Total number of workers :	486	Total number of workers in the production unit to be monitored (if applicable) :	0
	MALE WORKERS	FEMALE WORKERS	
Permanent workers	<b>290</b>	<b>196</b>	
Temporary workers	<b>0</b>	<b>0</b>	
In management positions	<b>15</b>	<b>5</b>	
Apprentices	<b>0</b>	<b>0</b>	
On probation	<b>0</b>	<b>0</b>	
With disabilities	<b>0</b>	<b>0</b>	
Migrants (national citizens)	<b>241</b>	<b>158</b>	
Migrants (foreign citizens)	<b>0</b>	<b>0</b>	
Workers on the permanent payroll	<b>267</b>	<b>193</b>	
Production based workers	<b>0</b>	<b>0</b>	
With shifts at night	<b>190</b>	<b>79</b>	
Unionised	<b>0</b>	<b>0</b>	
Pregnant	<b>-</b>	<b>0</b>	
On maternity leave	<b>-</b>	<b>0</b>	

## Finding Report



### Performance Area 1 : Social Management System and Cascade Effect

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: D

Deadline date: 30/03/2022

#### GOOD PRACTICES:

None observed

#### AREAS OF IMPROVEMENT:

Mr. Jianfu Su/Factory director was appointed as the management representative for the implementation of amfori BSCI. In addition, the factory has also set up a social responsibility management team, including financial manager and admin manager. The management team had sufficient decision making power and resources to implement social responsibility requirements. The management team had a good understanding of social responsibility requirements and laws and regulations. The factory carried out annual internal audit and management review according to amfori BSCI Code of Conduct. The factory also conducted a social responsibility assessment on key suppliers and service providers and communicated the amfori BSCI Code of Conduct and TOI to them. However, gaps were still noted in implementation.

苏建福先生/厂长被任命为实施amfori BSCI的管理者代表。此外，工厂也组建了社会责任管理团队，包括财务经理和行政经理等。管理团队有足够的决策权和资源去落实社会责任要求。管理团队对社会责任要求和法律法规有较好的认识。工厂有根据amfori BSCI的准则进行年度内审和管理评审。工厂也对主要的供应商和服务提供商进行了社会责任评估，并向他们传达了amfori BSCI行为守则和实施条款。但是，在实施过程中仍存在差距。

**1.1 -** Social responsibility policies and management procedures have been established and the factory has appointed management representative and management teams to implement the requirements of the amfori BSCI Code of Conduct. However, some procedures have not been effectively implemented. For example, social insurance coverage was inadequate and workers' monthly overtime exceeded the legal requirement of 36 hours. According to the interview with the management representative, the factory's social responsibility operation was mainly based on past experience and learning from peers, and the factory has not developed effective measures to improve the social insurance coverage rate and reduce monthly overtime hours.

社会责任政策和管理程序已经建立，工厂任命了管理者代表和管理团队去落实amfori BSCI行为守则的要求。然而，部分程序并未有效实施。例如，社保覆盖率不足，工人的月加班超过法律要求的36小时。根据管理代表访谈，工厂社会责任的运作主要通过以往经验和向同行学习，工厂并未制定有效的措施去提高社保覆盖率和减少月加班时间。

**1.4 -** The factory had a production capacity assessment procedure in place, but it did not develop and implement a production plan so effectively that the sampled workers worked more than 36 hours of overtime per month. According to the interview of the management representative, the actual overtime work was based on the customer's order and delivery schedule, so it was difficult to meet the requirements of laws and regulations. In addition, the current recruitment situation was difficult.

工厂制定了生产能力评估程序，但是并未有效的制定和执行生产计划以至于抽样的工人月加班超过了36小时。根据管理代表访谈，实际的加班是根据客人的订单以及交期安排，很难做到符合法规要求。此外，目前的招工情况很难。

#### Remarks from Auditee:

None

### Performance Area 2 : Workers Involvement and Protection

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### GOOD PRACTICES:

None observed

#### AREAS OF IMPROVEMENT:

The factory has established a grievance procedure, worker representative election procedure and so on. Communication channels between management and workers, including suggestion box, worker representative, direct supervisor, etc. Workers elected two workers' representatives in June 2020, and regular communication meetings were held between workers' representatives and management representatives. The Social Responsibility Policy and the amfori BSCI Code of Conduct were posted on the workshop notice board. The workers interviewed were aware of their rights and obligations.

工厂已经建立了申诉程序，员工代表选举程序等等。管理人员与工人之间的沟通渠道，包括意见箱，工人代表，直接主管等。工人在2020年6月选举了2名工人代表，工人代表和管理层代表之间会定期召开了沟通会议。社会责任政策和amfori BSCI 行为准则张贴在车间通告栏上。访谈的工人知道他们的权利和义务。

#### Remarks from Auditee:

None

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

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The factory has established procedures for free association and collective bargaining. The factory currently had no union and no collective bargaining agreement. The factory did not prevent employees from organizing and negotiating. New employee training and regular training were provided to ensure that employees are aware of this right. Workers' representatives were free to contact employees and discuss workplace issues.

工厂已经建立了关于自由结社和集体谈判的程序。工厂目前没有工会，也没有集体谈判协议。工厂未阻止员工进行结社和谈判。新员工培训和定期的培训会提供给员工以确保员工知道该权利。工人代表可以自由接触员工并讨论工作场所问题。

#### **Remarks from Auditee:**

None

### **Performance Area 4 : No Discrimination**

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

Policies and procedures prohibiting discrimination have been established. The factory also communicated this policy to all employees and managements through training. Hepatitis B and pregnancy tests were not performed on employees during recruitment. Employees interviewed also said they had not experienced discrimination.

禁止歧视的政策和程序已经建立。工厂也通过培训将该政策传达给全体员工和管理人员。在招聘时不会对员工进行乙肝和怀孕测试。受访的员工也表示没有受到过歧视。

#### **Remarks from Auditee:**

None

### **Performance Area 5 : Fair Remuneration**

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date: 30/03/2022

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The local legal minimum wage was RMB 1800 per month (RMB 10.34 per hour) after January 1, 2020. The factory provided payroll records for review from March 2020 to February 2021. June 2020, December 2020 and February 2021 were the main sampling months. All workers were paid by hourly rate, with minimum of RMB 11.494 per hour (equal to RMB 2000 per month), which was higher than the minimum wage standard. Wages were paid at the end of each month by bank transfer for the previous month. Pay slips also provided to workers and need signed for confirmation. Statutory benefits such as annual leave, sick leave, marriage, etc. were provided to all employees. However, gaps were still noted in implementation.

当地法定最低工资在2020年1月1日后是人民币1800元每月（人民币10.34元每小时）。工厂提供了2020年3月至2021年2月的工资记录供查看。2020年6月，12月和2021年2月作为主要抽样月份。员工工资为时薪制，最低为人民币为11.494元每小时（合人民币2000元每月），高于最低工资标准。每个月月底通过转账发放上个月工资，工资条会提供给员工并需要签字确认。法定福利如年假、病假、婚嫁等也有提供给全体员工。但是，在实施过程中仍存在差距。

**5.5 -** The factory's social insurance coverage was insufficient. The factory currently had 460 direct hired employees (including 30 new hired employees and no retired employees). The social insurance records of the most recent one year were available for viewing. According to the social insurance records of March 2021, excluding 30 new hired employees, there were still 153 employees who have not purchased retirement, unemployment, work injury, medical and maternity insurance. According to employee and management interviews, social insurance was purchased voluntarily. Most employees have purchased the new rural insurance in their hometown, so they were unwilling to participate in social insurance. The factory did not collect records of employees participating in the new rural insurance. Remarks: The factory has purchased group accident insurance from Ping An Insurance Company for all employees who have not participated in social insurance, valid until May 11, 2021. Reference Law: PRC Labour Law Article 72&73.

工厂的社保覆盖率不足。工厂目前一共460名直接招聘员工（含30名新入职员工，无退休员工）。最近一年的社保记录提供了查看，根据2021年3月的社保记录，除去30名新入职员工，仍有153名员工未购买养老，失业，工伤，医疗和生育保险。根据员工和管理访谈，社保是自愿购买的。大部分员工在老家购买了新农保，所以不愿意参加社保。工厂并未搜集员工参加新农保的记录。备注：工厂为未参加社保的所有员工购买了平安保险公司的团体意外险，有效期至2021年5月11日。参考法规：《中华人民共和国劳动法》第七十二条&七十三条。

#### **Remarks from Auditee:**

None

### Performance Area 6 : Decent Working Hours

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: D

Deadline date:30/03/2022

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The factory has established procedures for managing working hours. Employees used fingerprint/facial recognition systems to record their working hours. Attendance records from March 2020 to April 2, 2021 were available for review. June 2020, December and February 2021 were used as the main sampling months. Each month, 25 employees were randomly selected as the main sample. Office, QC, Warehouse and Packing Departments worked for one shift: 8:00-12:00, 13:30-17:30. Overtime at night was usually 2 hours (18:00-20:00). Other production departments worked in three shifts: 8:00-16:00, 16:00-24:00, 24:00-8:00. Subcontracted security guards and boiler workers worked for 2 shifts: 8:00-20:00, 20:00-8:00. Subcontracted kitchen workers for one shift: 9:00-13:00, 16:00-18:00, 22:00-24:00. Every Sunday was the fixed rest day. The overtime pay for normal working days, rest days and statutory holidays is respectively 150%, 200% and 300% of normal wages. No overtime work on holidays. In the sampled attendance, the maximum daily overtime time was 2 hours, the maximum weekly overtime time was 18 hours and the maximum monthly overtime time was 78 hours. However, gaps were still noted in implementation.

工厂建立了工作时间的管理程序。员工使用指纹/面部识别系统来记录上班时间。2020年3月至2021年4月2日的考勤记录提供了查看。2020年6月，12月和2021年2月作为主要抽样月份。每个月随机抽出了25名员工作为主要样本。办公室，品质，仓库，包装部门为一班：8:00-12:00, 13:30-17:30。晚上加班一般为2小时 (18:00-20:00)。其余生产部门为三班倒：8:00-16:00, 16:00-24:00, 24:00-8:00。外包的保安和锅炉工为2班倒：8:00-20:00, 20:00-8:00。外包的厨工为一班：9:00-13:00, 16:00-18:00, 22:00-24:00。每周日为固定休息日。员工正常工作日、休息日和法定假日的加班费分别按平时工资的150%、200%和300%支付。没有发现节假日加班。所抽取样本考勤中，最大日加班时间2小时，最大周加班18小时，最大月加班78小时。但是，在实施过程中仍存在差距。

**6.2 -** The time records from March 2020 to April 2, 2021 were provided for review. As per time records and management interview, there was no obvious peak or low seasons in factory. 25 sampled employees' time records were selected in June 2020, December 2020 and February 2021. The samples and the detailed overtime hours were as below: 7/25 sampled employees' monthly overtime hours in June 2020 were exceed 36 hours, which up to 74 hours. 7/25 sampled employees' monthly overtime hours in December 2020 were exceed 36 hours, which up to 78 hours. All 25 sampled employees' monthly overtime hours in February 2021 were not exceed 36 hours (Because of the Chinese New Year holiday, workers worked only six regular days). Overtime in the factory generally existed in the production workers with one shift, while the production workers of three shifts had less overwork overtime per month. According to management interviews, the factory has not established an overtime control and early warning mechanism, and has not properly formulated production plans based on monthly overtime laws. According to employee interviews, overtime was voluntary, and they did not know the control and upper limit of overtime. Remark: The maximum monthly overtime hour in March and April 2021 (till April 2, 2021) was up to 78 and 2 hours respectively. Reference Law: PRC Labour law, Article 41. 2020年3月至2021年4月2日的考勤提供了查看。根据管理访谈和考勤记录，工厂无明显淡旺季。2020年6月，2020年12月和2021年2月分别抽了25名员工，加班情况如下：2020年6月，7/25名抽样员工月加班超过36小时，最大达到74小时。2020年12月份，7/25名抽样员工月加班超过36小时，最大为78小时。2021年2月份，所有25名抽样员工月加班未超过36小时（由于中国春节假期，工人只上了6天正班）。工厂的加班超时普遍存在于一班制的生产工人，三班制的生产工人月加班超时情况较少。根据管理访谈，工厂未建立加班管控和预警机制，并未根据月加班法律去合理制定生产计划。根据员工访谈，加班是自愿的，他们不清楚加班的管控以及上限。备注：2021年3月和4月（至2021年4月2日）最大月加班小时分别为78和2小时：参考法律《中华人民共和国劳动法》，第四十一条。

#### **Remarks from Auditee:**

None

### Performance Area 7 : Occupational Health and Safety

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:30/09/2021

#### GOOD PRACTICES:

None observed

#### AREAS OF IMPROVEMENT:

The factory has established the health and safety committee including workers' representatives, and health and safety communication meetings were held regularly. The factory also conducted regular training on health and safety for all employees, including safety in production, labor protection supplies, first-aid knowledge and other contents. Fire evacuation drills were held twice a year, the most recent was on November 30, 2020. The workers knew how to escape and use fire fighting equipment. Health and safety risk assessment was carried out, covering jobs, special populations, infectious diseases, etc. There were enough safety exits in the workshop, and safety exits and evacuation passages were unblocked. The factory has trained 9 qualified first aid workers, and the first aid boxes in the workshop were full of medicines. Workers were free to use toilets and drinking water during the working hours. The factory provided dormitory and canteen for employees, but did not provide transportation. However, gaps were still noted in implementation.

工厂已经建立了包含工人代表的健康安全委员会，健康安全沟通会议定期举行。工厂也定期对全体员工进行健康安全方面的培训，内容包括安全生产、劳保用品、急救知识等内容。消防疏散演习每年举行2次，最近一次在2020年11月30日。根据工人访谈，工人了解如何逃生以及使用消防设备。工厂进行了健康安全风险评估，内容覆盖了工作岗位、特殊人群、传染性疾病等。车间内安全出口数量足够，安全出口和疏散通道都保持畅通。工厂培训了9名合格的急救人员，车间内急救药箱药品充足。工人可以在上班期间自由使用洗手间和饮用水。工厂提供了宿舍和餐厅给员工，没有提供交通工具。但是，在实施过程中仍存在差距。

7.1 - According to the workplace occupational-disease-hazard factor testing report and site tour, the factory's shaping and cutting workshop produced noise, and there were more than 85 decibels of some positions. The factory provided annual occupational health check-up for employees who were exposed to occupational hazard positions. However, pre-service and off- service occupational health examinations were not provided for workers in these positions. Remark: According to the management interview and documents review, in recent one year, there were about 28 employees newly hired and 9 employees resigned who were exposed to occupational hazards. Reference Law: PRC Law on Prevention and Control of Occupational Diseases, Article 35

根据工作场所职业病危害因素检测报告以及现场观查，工厂的成型和切边车间会产生噪音，并且会有岗位超过85分贝。工厂为接触职业危害岗位的员工提供了年度的在岗职业健康体检。但是，并未提供岗前和离岗的职业健康体检给这些岗位的工人。备注：根据管理访谈和文件查阅，最近一年接触职业危害岗位大约有28人入职，9人离职。参考法规：《中华人民共和国职业病防治法》第三十五条

7.9 - The factory has tested the occupational hazard factors in the workplace and obtained the report. According to the report, noise levels in some positions exceeded 85 decibels. However, the results were not posted on the workshop notice board for workers to review. Reference law: Law of the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 24

工厂已经进行了工作场所职业病危害因素检测并取得了报告。根据报告显示，部分岗位的噪音会超过85分贝。然而，工厂并未将检测结果张贴在车间宣传栏以便员工查看。参考法律法规：中华人民共和国职业病防治法，第二十四条

7.17 - The elevator safety management certificate of the factory expired on January 5, 2021, and renew was not arranged in time. According to the management representative interview, no renew was scheduled due to management negligence. Reference law: Regulations on Safety Supervision of Special Appliance Personnel, Article 38

工厂的电梯安全管理人员证书于2021年1月5日过期，并未及时安排员工复审。根据管理代表解释，由于管理疏忽，未安排复审。参考法规：《特种设备安全监察条例》第三十八条

7.21 - The factory provided kitchen and canteen, and also kept food samples in the refrigerator. However, the sample retention in the canteen did not meet the legal requirements, for example, it was not placed in a special airtight container, the container was not marked with the name and time of the food sample retention and no special person was arranged to record the sample retention and so on. Management explanation, because the kitchen was subcontracted to a third party, they neglected the monitoring. Reference Law: Operating Specifications on Food Safety in Catering Services, Article 7.9

工厂提供了厨房和餐厅，也在冰箱保存了食物样本。然而，食堂的留样并不符合法律要求，例如，未置于专用密闭容器内，容器未标注留样食品名称和时间，未安排专人记录留样情况等等。管理解释，由于厨房是承包给了第三方，所以在管理上存在疏忽。相关法律法规：《餐饮服务食品安全操作规范》第7.9条

#### Remarks from Auditee:

None

### Performance Area 8 : No Child Labour

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### GOOD PRACTICES:

None observed

#### AREAS OF IMPROVEMENT:

The factory has established procedures to prohibit the use of child labor and child labor remedy system. The factory checked the ID card of the employee when he/she enters the factory. In case of any doubt about the employee's age, the personnel specialist will verify the employee's status through a technical interview. In the audit process, through the personnel data of all employees, on-site observation and worker interviews, no child labor was found.

工厂已经建立了禁止使用童工的程序和童工补救制度。员工入职时工厂会查看员工的身份证件并且当人事专员对员工年龄有怀疑时，会通过有技巧地面谈以核实员工情况。在审核过程中，通过查阅所有员工的人事资料，现场观察和工人访谈，未发现有任何童工存在。

#### Remarks from Auditee:

None

### Performance Area 9 : Special protection for young workers

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

No young workers were used in the factory. The youngest worker during the audit was 18 years old. The factory has also established procedures and policies for the protection of young workers, including recruitment procedures, training, risk assessment and complaint mechanisms.  
工厂未使用未成年工，审核期间年龄最小的员工已有18岁。工厂也建立了关于未成年工的保护程序和政策，包括招募程序、培训、风险评估和申诉机制等。

#### **Remarks from Auditee:**

None

### Performance Area 10 : No Precarious Employment

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:30/09/2021

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

All the workers have signed the labor contract with the factory, which was written in Chinese and contained basic contents such as wages, hours, holidays and benefits. According to on-site observation and employee interviews, no dispatches, temporary workers or student workers were found in the factory. However, gaps were still noted in implementation.  
所有的工人都已经和工厂签订了劳动合同，合同内容是中文的，包含了工资、工时、假期和福利等基本内容。根据现场观察，员工访谈，没有发现工厂使用派遣工、临时工或学生工。但是，在实施过程中仍存在差距。

**10.2 -** Workers in some positions in the factory were exposed to occupational hazards of noise. However, the labor contract signed by the factory and employees did not inform the occupational hazards and protection of the post. Reference Law: People's Republic of China on Prevention and Control of Occupational Diseases, Article 33.  
工厂部分岗位的工人会接触噪音职业危害。然而，工厂与员工签订的劳动合同并未告知岗位的职业危害和防护等等。参考法律法规：中华人民共和国职业病防治法，第三十三条。

#### **Remarks from Auditee:**

None

### Performance Area 11 : No Bonded Labour

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The factory has established the policy and management procedure forbidding forced labor. Forced labor was strictly prohibited in the factory. Employees have the right to leave the factory freely after work, and can apply for resignation freely. The factory's disciplinary action was verbal or written warning, no fine was used.  
工厂已经建立了禁止强迫劳工的政策和管理程序，强迫劳工在工厂是严格禁止的。员工有权利在下班后自由离开工厂，也可以自由申请离职。工厂的惩戒措施是口头或者书面警告，没有罚款。

#### **Remarks from Auditee:**

None

### Performance Area 12 : Protection of the Environment

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:30/03/2022

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The factory has obtained the EIA report, the approval and the environmental protection completion acceptance report. The factory has obtained the discharge permit (No. : 91350200575036784U001P), valid until July 28, 2023. Pulping and shaping processes in factory produced noise, waste water and waste gas. The factory has regular inspected of production waste gas, production waste water and factory boundary noise. However, gaps were still noted in implementation.

工厂已经取得了环评报告、批复和环保竣工验收报告。工厂已经取得了排污许可证（编号：91350200575036784U001P），有效期至2023年7月28日。工厂的制浆和成型工序会产生噪音、废水和废气。工厂有定期检测生产废气、生产废水和厂界噪音。但是，在实施过程中仍存在差距。

**12.4 -** 1. The main hazardous waste of the plant was empty barrels of chemicals and waste machine oil. The factory has commissioned a qualified unit to carry out these transfers. For example, the last empty barrels transfer was in July 2020. However, the factory did not transfer the waste machine oil in the last one year. The management explained that the waste machine oil was not transferred because the amount generated was so small. Reference law: Law of the People's Republic of China on the Prevention and Control of Environment Pollution Caused by Solid Wastes, Article 81 2. As confirmed with management, the factory did not monitor the cooking fume discharged from kitchen in recent one year. Reference Law: Measures for the Administration of Environmental Surveillance, Article 21

1.工厂主要的危废如化学品空桶和废机油等。工厂有委托有资质的单位对这些进行转移，如最近一次的空桶转移是在2020年7月。然而，工厂最近一年度并未对废机油进行转移。管理解释，由于废机油产生的量非常少，这些废物一直没转移。参考法律：《中华人民共和国固体废物污染环境防治法》第八十一条 2.根据管理人员确认，工厂最近一年没有监测其厨房的油烟排放。参考法律法规：《环境监测管理办法》第二十一条

#### **Remarks from Auditee:**

None

### Performance Area 13 : Ethical Business Behaviour

Full Audit [Audit Id - 207321] Audit Date: 31/03/2021 PA Score: A

Deadline date:30/03/2022

#### **GOOD PRACTICES:**

None observed

#### **AREAS OF IMPROVEMENT:**

The factory has established management procedures to make it clear that there should be no bribery, solicitation, embezzlement, corruption, false information and false statements in the supply chain. The factory has also trained all its employees in business ethics. During the audit, the factory provided the required documents in a timely manner. No discrepancies were found according to production records, warehouse records, employee interviews and attendance records. However, gaps were still noted in implementation.

工厂已建立了管理程序明确在供应链中不能存在行贿索贿，挪用盗用公款，贪腐，提供虚假资料，虚报等行为。工厂也对全体员工进行了商业道德的培训。审核期间，工厂及时提供了所要求的文件，根据生产记录，仓库记录，员工访谈和考勤记录，没有发现不一致的情况。但是，在实施过程中仍存在差距。

**13.2 -** The factory's business license address was not accurate. The factory's business license address was No.523, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen City. However, the actual address of the factory was No. 513, 515, 517, 519, 523, 525, 527, 529, 531, 533, 535, 557, 539, Ji'an Road, Tong'an Industrial Concentration Area, Tong'an District, Xiamen City. According to the telephone inquiry of the industrial and commercial department and the interview between the management representative and the financial manager, the factory could add the other building numbers into the business license address by adding the place of business site. However, according to the factory's financial manager, due to the auditee's own reasons, the factory can not change the address, on the one hand, the actual address was very long and it would affect the company's impression. On the other hand, due to business operation, the auditee planned to use some building numbers to register some new companies (trade, technology, consulting, etc.). Currently, three numbers 517, 529 and 531 have been used. Reference law: Regulation of the People's Republic of China for Controlling the Registration of Enterprises as Legal Persons, Article 17

工厂营业执照地址不准确。工厂营业执照地址为厦门市同安区同安工业集中区集安路523号。然而，工厂实际使用的地址为厦门市同安区同安工业集中区集安路513, 515, 517, 519, 523, 525, 527, 529, 531, 533, 535, 537, 539号。根据工商部门电话查询，管理代表和财务经理访谈确认，工厂可以通过增加经营场所的方式将其余建筑编号添加进营业执照地址内。但是，根据工厂财务经理解释，由于被审核方自身的原因，工厂无法进行地址变更，一方面是由于变更后的地址特别长，影响公司形象。另一方面，公司由于商业运作，计划使用其中的一些建筑编号去注册一些新公司（贸易，技术，咨询等），目前已经使用了517, 529和531三个号码。参考法律：《中华人民共和国企业法人登记管理条例》第十七条

#### **Remarks from Auditee:**

None



## Summary

Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Full Audit	31/03/2021	207321	<span style="background-color: red; color: white; padding: 2px;">D</span>	<span style="background-color: #80bfff; color: white; padding: 2px;">A</span>	<span style="background-color: red; color: white; padding: 2px;">D</span>	<span style="background-color: #80bfff; color: white; padding: 2px;">A</span>	<span style="background-color: #80bfff; color: white; padding: 2px;">C</span>									



## Producer Photos



External photo(s) of the production unit(s)  
Dormitory building outlook.jpg



Photo of fire safety equipment  
Fire extinguisher and Fire hydrant.jpg



Photo of the inside of the main production hall  
Cutting.jpg



External photo(s) of the production unit(s)  
Factory name.jpg



Photo of fire safety equipment  
Fire hydrant tested.jpg



Photo of the inside of the main production hall  
Finished goods warehouse.jpg



External photo(s) of the production unit(s)  
Office building outlook.jpg

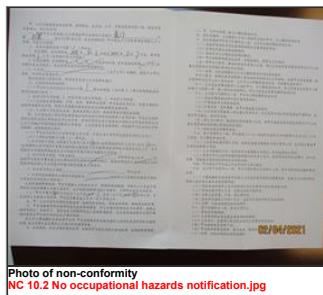


Photo of non-conformity  
NC 10.2 No occupational hazards notification.jpg



Photo of the inside of the main production hall  
Inspection.jpg



External photo(s) of the production unit(s)  
Production building outlook.jpg



Photo of non-conformity  
NC 13.2 Business license address not updated.jpg



Photo of the inside of the main production hall  
Packing.jpg



Photo first aid facilities  
Eyewash station.jpg



Photo of non-conformity  
NC 5.5 Insufficient social insurance coverage.jpg



Photo of the inside of the main production hall  
PPE sign and Hazardous factor posted.jpg



Photo of first aid facilities  
First aid kits.jpg

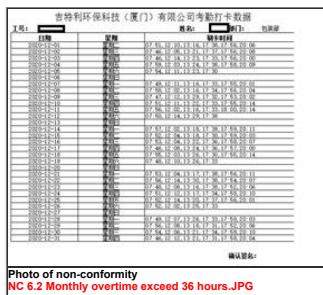


Photo of non-conformity  
NC 6.2 Monthly overtime exceed 36 hours.JPG



Photo of the inside of the main production hall  
Raw material warehouse.jpg



Photo of chemical storage room (if applicable)  
Chemical warehouse.jpg



Photo of non-conformity  
NC 7.17 Certificate expired.jpg



Photo of the inside of the main production hall  
Shaping.jpg



Photo of chemical storage room (if applicable)  
MSDS posted.jpg



Photo of non-conformity  
NC 7.21 Improper food sample.jpg



Photo of the inside of the main production hall  
Suggestion box.jpg



Photo of fire safety equipment  
Emergency exit with exit sign and emergency light.jpg



Photo of the canteen (if applicable)  
Canteen.jpg



Photo of the inside of the main production hall  
Time records machine.jpg



Photo of fire safety equipment  
Emergency light tested.jpg



Photo of the canteen (if applicable)  
Kitchen.jpg



Photo of the sanitary facilities  
Drinking water.jpg



Photo of fire safety equipment  
Evacuation plot plan.jpg



Photo of the dormitories (if applicable)  
Dormitory room inside.jpg



Photo of the sanitary facilities  
Hand wash facilities with supplies.jpg



Photo of fire safety equipment  
Fire alarm.jpg



Photo of the code of conduct on display  
Posted amfori BSCI COC.jpg



Photo of the sanitary facilities  
Restroom.jpg