





Certificate

OEKO-TEX® STANDARD 100

**Dongguan King Choice Zhanchuang
Garment Accessories Co., Ltd**

is granted the OEKO-TEX® STANDARD 100 certification
and the right to use the trademark.

SCOPE

Metal fastener (snap and shank button, eyelet, rivet, button, end clamp, bar buckle, stopper, cord stopper and end, adjuster and ring) made of brass and zinc alloy, electroplated in black nickel, antique bronze and silver, with or without white or coloured pigment painting; woven tape, jacquard elastic band and drawcord made of 100 % polyester, 100 % polyamide as well as mixtures with elastane(spandex) or rubber thread, polyester/polyamide(nylon)/elastane(spandex), white, disperse or acid dyed; Webbing made of 100 % cotton, white, mélange grey and yarn dyed. Exclusively produced from material certified according to OEKO-TEX® STANDARD 100.

PRODUCT CLASS

I (baby articles) - Annex 4



This certificate 11-67765 is valid until 31.08.2024.

SUPPORTING DOCUMENTS

- ✓ Test report : 67765
- ✓ Declaration of conformity in accordance with EN ISO 17050-1 as required by OEKO-TEX®
- ✓ OEKO-TEX® Terms of Use (ToU)

Agustina Oliver
Senior Technical Officer

Joe Prince
Ecology Services Manager

Further compliance information (REACH, SVHC, POP, GB18401 etc.) can be found on oeko-tex.com/en/faq.

The certificate is based on the test methods and requirements of the OEKO-TEX® STANDARD 100 that were in force at the time of evaluation.

Manchester, 2023-08-30





BUREAU
VERITAS



Bureau Veritas Consumer Products Services, Inc.
One Distribution Center Circle, Suite #1, Littleton, 01460, Massachusetts, United States

SCOPE CERTIFICATE

Scope Certificate Number BVC-TE-00049513-GRS-2404-10002495-V1.0

Scope Certificate Version Number BVC-TE-00049513-GRS-2404-10002495-V2.0

Bureau Veritas Consumer Products Services Inc.

certifies that

Dong guan King choice zhanchuang Garment Accessories Co., Ltd

Textile Exchange-ID (TE-ID): TE-00049513

Client Number: BVCN2040

Room 401, Building 1, No. 11, Qishi Jianshe Road, Qishi Town, Dongguan City

523000 Guangdong Sheng, China

has been audited and found to be in conformity with the

GLOBAL RECYCLED STANDARD (Version 4.0)

Product categories mentioned below (and further specified in the product appendix) conform with the standard(s):

Functional accessories (PC0017)

Process categories carried out under responsibility of the above mentioned organization for the certified products cover:

Molding (PR0018); Manufacturing (PR0016); Braiding (PR0034)

This certificate is valid until: 2025-03-31

Audit criteria: Global Recycled Standard V4.0; Content Claim Standard V3.1; Textile Exchange Standards Claims Policy V1.3

Place and Date of Issue

China, 2024-04-01

Anniversary Date: 2024-04-01

Last Updated: 2024-04-25

Certification Body



BUREAU
VERITAS

Standard



Rajan Kamalanathan

Rajan Kamalanathan

Certification Body Licensed by: Textile Exchange; Licensing Code: CB-BVC

Certification Body Accredited by: The ANSI National Accreditation Board (ANAB); Accreditation Number: 0956

Inspection Body: Bureau Veritas LCIE China Company Limited

This Scope Certificate provides no proof that any goods delivered by its holder are GRS certified. Proof of GRS certification of goods delivered is provided by a valid Transaction Certificate (TC) covering them.

The issuing body may withdraw this certificate before it expires if the declared conformity is no longer guaranteed.

To authenticate this certificate, please visit www.TextileExchange.org/Certificates.



BUREAU
VERITAS



Bureau Veritas Consumer Products Services, Inc.
One Distribution Center Circle, Suite #1, Littleton, 01460, Massachusetts, United States

Scope Certificate Number BVC-TE-00049513-GRS-2404-10002495-V1.0

Scope Certificate Version Number BVC-TE-00049513-GRS-2404-10002495-V2.0

(continued)

Dong guan King choice zhanchuang Garment Accessories Co., Ltd

Global Recycled Standard_GRS_V4.0

Under the scope of this certificate, the following products are covered:

Product Appendix

Product Number	Product Category	Product Details	Material Composition*	Standard (Label Grade)	Facility TE-ID
1	Functional accessories (PC0017)	Button blank (PD0010)	100 % Recycled post-consumer metal [brass] (RM0249)	GRS	TE-00049513
2	Functional accessories (PC0017)	Button blank (PD0010)	Recycled post-consumer metal [brass] (RM0249) + Zinc alloy (RM0300) + Metal [aluminum] (RM0246)	GRS	TE-00049513
3	Functional accessories (PC0017)	Button blank (PD0010)	100 % Recycled post-consumer zinc alloy (RM0303)	GRS	TE-00049513
4	Functional accessories (PC0017)	Button blank (PD0010)	Recycled post-consumer zinc alloy (RM0303) + Metal [brass] (RM0246) + Metal [aluminum] (RM0246)	GRS	TE-00049513
5	Functional accessories (PC0017)	Button blank (PD0010)	Recycled post-consumer zinc alloy (RM0303) + Metal [aluminum] (RM0246)	GRS	TE-00049513
6	Functional accessories (PC0017)	Button blank (PD0010)	100 % Recycled post-consumer metal [aluminum] (RM0249)	GRS	TE-00049513
7	Functional accessories (PC0017)	Button blank (PD0010)	100 % Recycled post-consumer copper (RM0295)	GRS	TE-00049513
8	Functional accessories (PC0017)	Button blank (PD0010)	Recycled post-consumer copper (RM0295) + Copper (RM0292) + Zinc (RM0300)	GRS	TE-00049513
9	Functional accessories (PC0017)	Button blank (PD0010)	Recycled post-consumer copper (RM0295) + Recycled post-consumer zinc (RM0303) + Copper (RM0292) + Zinc (RM0300)	GRS	TE-00049513
10	Functional accessories (PC0017)	Trimnings [Webbing] (PD0039)	100 % Recycled post-consumer polyester (RM0189)	GRS	TE-00049513
11	Functional accessories (PC0017)	Trimnings [Webbing] (PD0039)	Recycled post-consumer polyester (RM0189) + Polyester (RM0186)	GRS	TE-00049513

Note: * Quantification (percentages) of material composition is optional. [] Square brackets refer to certified components of a product.

Place and Date of Issue
China, 2024-04-01

Certification Body

Standard

Rajan Kamalanathan
Rajan Kamalanathan



BUREAU
VERITAS





BUREAU
VERITAS



Bureau Veritas Consumer Products Services, Inc.
One Distribution Center Circle, Suite #1, Littleton, 01460, Massachusetts, United States

Scope Certificate Number BVC-TE-00049513-GRS-2404-10002495-V1.0

Scope Certificate Version Number BVC-TE-00049513-GRS-2404-10002495-V2.0

(continued)

Dong guan King choice zhanchuang Garment Accessories Co., Ltd

Global Recycled Standard_GRS_V4.0

Under the scope of this certificate, the following facilities have been audited and found to be in conformity.

Site Appendix

Facility Name – TE-ID	Address	Process Categories	Standards	Last Audit Date
Dong guan King choice zhanchuang Garment Accessories Co., Ltd (main) – TE-00049513	Room 401, Building 1, No. 11, Qishi Jianshe Road, Qishi Town, Dongguan City, 523000 Guangdong Sheng, China	Molding (PR0018); Manufacturing (PR0016); Braiding (PR0034)	GRS	2024-03-14

Associated Subcontractor Appendix

None

Independently Certified Subcontractor Appendix

None

Place and Date of Issue
China, 2024-04-01

Rajan Kamalanathan
Rajan Kamalanathan

Certification Body



BUREAU
VERITAS

Standard



TH001



TH002



TH003



TH004



TH005



TH006



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Th8014



Th8017



Th8057



Th4036



Th4019



Th8010



Th4042



Th8043





SMETA Corrective Action Plan Report (CAPR)

Version 6.1



Audit Details				
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC5000039713	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1000046538	
Business name (Company name):	Dong guan King choice zhanchuang Garment Accessories Co. Ltd			
Site name:	Dong guan King choice zhanchuang Garment Accessories Co Ltd			
Site address:	广东省东莞市企石镇企石建设路11号1号楼401室 Room 401, Building 1, No. 11, Qishi Jianshe Road, Qishi Town Dongguan 523000 CN	Country:	CN	
Site contact and job title:	Xu Chunhua / Production manager			
Site phone:	13432632026	Site e-mail:	247024122@qq.com	
SMETA Audit Pillars:	☒ Labour Standards	☒ Health and Safety (plus Environment 2-Pillar)	☒ Environment 4-pillar	☒ Business Ethics
Date of Audit:	2024-09-02			

Audit Company Name:
ALGI China

Audit Conducted By					
Affiliate Audit Company	☒	Purchaser	☐	Retailer	☐
Brand owner	☐	NGO	☐	Trade Union	☐
Multi-stakeholder	☐	Combined Audit (select all that apply)			

Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	08:30	In	08:00
	Out	17:30	Out	12:00
Audit type:	FULL_INITIAL			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Xu Chunhua / Production manager			
Is further information available	No			

Audit attendance	Management	Worker Representatives	
		Worker Committee representatives	Union representatives
A: Present at the opening meeting?	Yes	Yes	No
B: Present at the audit?	Yes	Yes	No
C: Present at the closing meeting?	Yes	Yes	No
<i>Reason for absence at the opening meeting</i>	There was no union in the factory.		
<i>Reason for absence during the audit</i>	There was no union in the factory.		
<i>Reason for absence at the closing meeting</i>	There was no union in the factory.		

Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of Issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1	§1 §2 §3 §4	4	0	0	NC - d0d2b0a8-d6fd-47f4-846a-c9414e6bafc1 NC - b1db549a-aa74-4e89-b06d-30ba97689063 NC - f93a38b7-25e2-4a90-9fd6-8da621d57d48 NC - e39ea613-0d62-42fa-91c1-d2ef4b644de9
<u>5 - Living wages are paid</u>	5.1	§5	1	0	0	NC - 5a89c918-a1cc-490a-9e5b-8b8b06dbdabc
<u>6 - Working hours are not excessive</u>	6.1	§6	1	0	0	NC - ed682441-0fc3-44df-a5e0-d858d619ed87

Local Law Issues

Issue	Description
§1	In accordance with Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, article 4.2.3, warning sign, form 2, 2-7, electric shock warning sign set up scope and location: electricity devices and circuit where electric shock may happen.根据《安全标志及使用导则（GB 2894-2008）》警示标志4.2.3, 表2, 2-7, 当心触电警示标志设置范围和地点：可能发生触电危险的电器设备和线路，如：配电室、开关等。
§2	In accordance with Law of PRC on Work Safety article 45. Production and business entities must provide employees with labor protection products that comply with national standards or industry standards and supervise and educate employees to wear and use them in accordance with the rules of use. Article 47, the production and business unit shall arrange funds for the provision of labor protection equipment and safety production training.根据《中华人民共和国安全生产法》第四十五条，生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。
§3	In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices.根据《生产设备安全卫生设计总则》第6.1.6条：以操作人员的位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。

S4	In accordance with PRC Occupational Disease Prevention Law article 35, the employ unit should provide occupational disease health check for laborers with exposure to occupational disease harm. The employ unit should provide health check to these laborers at the time of employment, position take-up period and at time of off position; the laborers should be informed with health check result without deceit. The occupational disease health check fee should be paid by employer. Workers who are found to have health damage after occupational health inspections shall be transferred from their original jobs and properly arranged; workers who have not undergone post-job occupational health inspections, their contract shall not be dismissed or terminated.根据《中华人民共和国职业病防治法》第三十五条,对从事接触职业病危害作业的劳动者,用人单位应当按照国务院卫生行政部门的规定组织上岗前,在岗期间和离岗时的职业健康检查,并将检查结果如实告知劳动者。职业健康检查费用由用人单位承担。 对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者,应当调离原工作岗位,并妥善安置;对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。
S5	In accordance with Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing. 依据《中华人民共和国劳动法》(2018修正)第七十二条 社会保险基金按照保险类型确定资金来源,逐步实行社会统筹。用人单位和劳动者必须依法参加社会保险,缴纳社会保险费。第七十三条 劳动者在下列情形下,依法享受社会保险待遇: (一) 退休; (二) 患病、负伤; (三) 因工伤残或者患职业病; (四) 失业; (五) 生育。
S6	In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.根据《中华人民共和国劳动法》第41条,用人单位由于生产经营需要,经与工会和劳动者协商后可以延长工作时间,一般每日不得超过一小时;因特殊原因需要延长工作时间的,在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时,但是每月不得超过三十六小时。

Corrective Action Plan - Non Compliances

Non-Compliance		Evidence																															
[Back to findings summary]																																	
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>d0d2b0a8-d6fd-47f4-846a-c9414e6bafc1</td></tr><tr><td>Clause</td><td>3 - Working conditions are safe and hygienic</td></tr><tr><td>Issue Title</td><td>227 - Unmarked / incorrect labels / signage / instructions for electrics</td></tr><tr><td>Subcategory</td><td>Electrical risk</td></tr><tr><td>New or carried over?</td><td>☒ New ☐ Carried Over</td></tr><tr><td>Root cause</td><td>☒ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, article 4.2.3, warning sign, form 2, 2-7, electric shock warning sign set up scope and location: electricity devices and circuit where electric shock may happen.根据《安全标志及使用导则（GB 2894-2008）》警示标志4.2.3, 表2, 2-7, 当心触电警示标志设置范围和地点：可能发生触点危险的电器设备和线路，如：配电室、开关等。</td></tr><tr><td>ETI code</td><td>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</td></tr><tr><td>Explanation to the non compliance</td><td>Based on site observation, 1 out of 5 electric cabinets was not posted with warning signs in punching workshop. 根据现场审核，冲压车间1/5个电箱没有张贴警示标志。</td></tr><tr><td>Follow up method</td><td>☐ Follow up audit ☒ Desktop audit</td></tr><tr><td>Timescale</td><td>☐ Immediate ☒ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other</td></tr><tr><td>Actions</td><td>It is recommended that the factory should ensure that all electricity devices and circuit in the factory are marked with avoid electric shock warning signs. 建议工厂确保在可能发生触点危险的电器设备和线路地点设置当心触电标志。</td></tr></table>			Non-Compliance		Status	OPEN	Reference	d0d2b0a8-d6fd-47f4-846a-c9414e6bafc1	Clause	3 - Working conditions are safe and hygienic	Issue Title	227 - Unmarked / incorrect labels / signage / instructions for electrics	Subcategory	Electrical risk	New or carried over?	☒ New ☐ Carried Over	Root cause	☒ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other	Root cause - Other		Local law issue	In accordance with Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, article 4.2.3, warning sign, form 2, 2-7, electric shock warning sign set up scope and location: electricity devices and circuit where electric shock may happen.根据《安全标志及使用导则（GB 2894-2008）》警示标志4.2.3, 表2, 2-7, 当心触电警示标志设置范围和地点：可能发生触点危险的电器设备和线路，如：配电室、开关等。	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	Explanation to the non compliance	Based on site observation, 1 out of 5 electric cabinets was not posted with warning signs in punching workshop. 根据现场审核，冲压车间1/5个电箱没有张贴警示标志。	Follow up method	☐ Follow up audit ☒ Desktop audit	Timescale	☐ Immediate ☒ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other	Actions	It is recommended that the factory should ensure that all electricity devices and circuit in the factory are marked with avoid electric shock warning signs. 建议工厂确保在可能发生触点危险的电器设备和线路地点设置当心触电标志。	 NC Electric cabinet without warning sign.jpg
Non-Compliance																																	
Status	OPEN																																
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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	b1db549a-aa74-4e89-b06d-30ba97689063	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	☒ New ☐ Carried Over	
Root cause	☒ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other	
Root cause - Other		
Local law issue	In accordance with Law of PRC on Work Safety article 45. Production and business entities must provide employees with labor protection products that comply with national standards or industry standards and supervise and educate employees to wear and use them in accordance with the rules of use. Article 47, the production and business unit shall arrange funds for the provision of labor protection equipment and safety production training.根据《中华人民共和国安全生产法》第四十五条，生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品，并监督、教育从业人员按照使用规则佩戴、使用。	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation, 3 out of 10 workers in punching and assembling workshop didn't wear the earplugs provided by factory during the audit.根据现场审核，审核期间冲压和组装车间3/10名员工没有佩戴工厂提供的耳塞。	
Follow up method	☐ Follow up audit ☒ Desktop audit	
Timescale	☐ Immediate ☒ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ ☐	
		 <u>NC Assembling worker didn't wear earplugs 2.jpg</u>
		 <u>NC Assembling worker didn't wear earplugs 1.jpg</u>

	365 days	Other	
Actions	It is recommended that factory should provide regular PPE training to workers, conduct regular PPE safety inspection at workplace, and develop and implement a Personal Protective Equipment (PPE) program to protect employees from workplace hazards that may cause bodily injury. 建议工厂应该给工人提供劳动防护用品培训，进行定期劳动防护用品安全检查，建立劳动防护用品程序以防止工人受到伤害。		

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	f93a38b7-25e2-4a90-9fd6-8da621d57d48	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt / hand guards on other machines)	
Subcategory	Machinery	
New or carried over?	☒ New ☐ Carried Over	
Root cause	☒ Training ☐ System ☐ Costs ☐ Lack of workers ☐ Other	
Root cause - Other		
Local law issue	In accordance with Article 6.1.6 of Code of Design of Manufacturing Equipment Safety and Hygiene, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices.根据《生产设备安全卫生设计总则》第6.1.6条：以操作人员的操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation, 10 out of 40 punching machines in punching workshop were not equipped with pulley guards, 5 out of 20 assembling machines in assembling workshop were not equipped with pulley guards during the audit. 根据现场审核，冲压车间10/40台正在使用的冲压机没有安装皮带轮防护罩，组装车间5/20台组装机没有安装皮带轮防护罩。	
Follow up method	☐ Follow up audit ☒ Desktop audit	
Timescale	☐ Immediate ☒ 30 days ☐ 60 days	
		 NC Punching machines without pulley guards.jpg  NC Assembling machine without pulley guard.jpg

	☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other	
Actions	It is recommended that factory should develop and implement procedures to reduce or eliminate the risk of an injury from moving machinery parts.工厂应建立程序以预防，降低和消除机械伤害。	

Non-Compliance		Evidence																						
[Back to findings summary]																								
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>e39ea613-0d62-42fa-91c1-d2ef4b644de9</td></tr><tr><td>Clause</td><td>3 - Working conditions are safe and hygienic</td></tr><tr><td>Issue Title</td><td>317 - No medical examinations / regular occupational health checks including disease checks of workers in hazardous situations (e.g. noise / chemicals / dust)</td></tr><tr><td>Subcategory</td><td>Worker Health</td></tr><tr><td>New or carried over?</td><td>☒ New ☐ Carried Over</td></tr><tr><td>Root cause</td><td>☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with PRC Occupational Disease Prevention Law article 35, the employ unit should provide occupational disease health check for laborers with exposure to occupational disease harm. The employ unit should provide health check to these laborers at the time of employment, position take-up period and at time of off position; the laborers should be informed with health check result without deceit. The occupational disease health check fee should be paid by employer. Workers who are found to have health damage after occupational health inspections shall be transferred from their original jobs and properly arranged; workers who have not undergone post-job occupational health inspections, their contract shall not be dismissed or terminated.根据《中华人民共和国职业病防治法》第三十五条，对从事接触职业病危害作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前，在岗期间和离岗时的职业健康检查，并将检查结果如实告知劳动者。职业健康检查费用由用人单位承担。 对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者，应当调离原工作岗位，并妥善安置；对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。</td></tr><tr><td>ETI code</td><td>3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.</td></tr></table>			Non-Compliance		Status	OPEN	Reference	e39ea613-0d62-42fa-91c1-d2ef4b644de9	Clause	3 - Working conditions are safe and hygienic	Issue Title	317 - No medical examinations / regular occupational health checks including disease checks of workers in hazardous situations (e.g. noise / chemicals / dust)	Subcategory	Worker Health	New or carried over?	☒ New ☐ Carried Over	Root cause	☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other	Root cause - Other		Local law issue	In accordance with PRC Occupational Disease Prevention Law article 35, the employ unit should provide occupational disease health check for laborers with exposure to occupational disease harm. The employ unit should provide health check to these laborers at the time of employment, position take-up period and at time of off position; the laborers should be informed with health check result without deceit. The occupational disease health check fee should be paid by employer. Workers who are found to have health damage after occupational health inspections shall be transferred from their original jobs and properly arranged; workers who have not undergone post-job occupational health inspections, their contract shall not be dismissed or terminated.根据《中华人民共和国职业病防治法》第三十五条，对从事接触职业病危害作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前，在岗期间和离岗时的职业健康检查，并将检查结果如实告知劳动者。职业健康检查费用由用人单位承担。 对在职业健康检查中发现有与所从事的职业相关的健康损害的劳动者，应当调离原工作岗位，并妥善安置；对未进行离岗前职业健康检查的劳动者不得解除或者终止与其订立的劳动合同。	ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
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Explanation to the non compliance	It was noted that the factory did not provide occupational disease health check to its workers in punching and assembling workshop (contact with noise) / polishing workshop (contact with noise and other inorganic dust). 在此次审核过程中，审核员发现工厂未给从事冲压和组装作业的员工（接触噪音）、打磨作业的员工（接触其他无机粉尘和噪音）提供职业病健康检查。		
Follow up method	☐ Follow up audit ☒ Desktop audit		
Timescale	☐ Immediate ☒ 30 days ☐ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other		
Actions	It is recommended that the factory should provide proper Health & Safety training to workers, conduct regular Health & Safety inspection, provide occupational health check to workers exposing to occupational disease harm. 建议工厂给相关工人提供健康安全培训，进行定期健康安全检査，按照法律要求定期对从事接触职业病危害作业的员工提供职业病		

Non-Compliance		Evidence																									
[Back to findings summary]																											
<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>5a89c918-a1cc-490a-9e5b-8b8b06dbdabc</td></tr><tr><td>Clause</td><td>5 - Living wages are paid</td></tr><tr><td>Issue Title</td><td>423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic</td></tr><tr><td>Subcategory</td><td>Benefits & Insurance</td></tr><tr><td>New or carried over?</td><td>☒ New ☐ Carried Over</td></tr><tr><td>Root cause</td><td>☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing. 依据《中华人民共和国劳动法》（2018修正）第七十二条 社会保险基金按照保险类型确定资金来源，逐步实行社会统筹。用人单位和劳动者必须依法参加社会保险，缴纳社会保险费。第七十三条 劳动者在下列情形下，依法享受社会保险待遇：（一）退休；（二）患病、负伤；（三）因工伤残或者患职业病；（四）失业；（五）生育。</td></tr><tr><td>ETI code</td><td>5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</td></tr><tr><td>Explanation to the non compliance</td><td>Based on the social insurance payment receipts from August 2023 to July 2024, it was noted that insufficient social insurance was provided to workers. There were 23 employees at the facility in July 2024, no temporary, no dispatch or no new joined employee was used, however, 3 retirement employees were used. According to social insurance receipt in July 2024, 7/20 employees (35%) did not participate in work-injury, pension, medical,</td></tr></table>			Non-Compliance		Status	OPEN	Reference	5a89c918-a1cc-490a-9e5b-8b8b06dbdabc	Clause	5 - Living wages are paid	Issue Title	423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic	Subcategory	Benefits & Insurance	New or carried over?	☒ New ☐ Carried Over	Root cause	☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other	Root cause - Other		Local law issue	In accordance with Labor Law of the People's Republic of China (2018 Amendment) Article 72, The sources of social insurance funds shall be determined according to the categories of insurance, and an overall pooling of insurance funds from the society shall be introduced step by step. The employing unit and laborers must participate in social insurance and pay social insurance premiums in accordance with the law. Article 73, Laborers shall, in accordance with the law, enjoy social insurance benefits under the following circumstances: 1. Retirement; 2. Illness or injury; 3. Disability caused by work-related injury or occupational disease; 4. Unemployment; and 5. Child-bearing. 依据《中华人民共和国劳动法》（2018修正）第七十二条 社会保险基金按照保险类型确定资金来源，逐步实行社会统筹。用人单位和劳动者必须依法参加社会保险，缴纳社会保险费。第七十三条 劳动者在下列情形下，依法享受社会保险待遇：（一）退休；（二）患病、负伤；（三）因工伤残或者患职业病；（四）失业；（五）生育。	ETI code	5.1 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.	Explanation to the non compliance	Based on the social insurance payment receipts from August 2023 to July 2024, it was noted that insufficient social insurance was provided to workers. There were 23 employees at the facility in July 2024, no temporary, no dispatch or no new joined employee was used, however, 3 retirement employees were used. According to social insurance receipt in July 2024, 7/20 employees (35%) did not participate in work-injury, pension, medical,	
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	unemployment and child-bearing insurances. The factory provided group commercial accident insurance for all employees, and valid period from March 1, 2024 to February 28, 2025. 根据2023年8月至2023年7月的社会保险缴款收据，发现工厂没有足够的社会保险提供给员工。2024年7月，工厂有23名员工，没有使用临时员工、派遣员工或新员工，但使用了3名退休员工。根据2023年7月的社会保险收据，7/20名员工（35%）没有参加工伤、养老金、医疗、失业和生育保险。工厂为所有员工提供了团体商业意外保险，有效期为2024年3月1日至2025年2月28日。		
Follow up method	☒ Follow up audit ☐ Desktop audit		
Timescale	☐ Immediate ☐ 30 days ☒ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other		
Actions	It is recommended that factory should ensure all eligible employees participate in all 5 types of social insurance schemes and therefore receive all of their statutory welfare to comply with the Law. 建议工厂确保所有符合条件的员工都参加5项社保并按法规要求给员工提供福利。		

Non-Compliance		Evidence																									
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<table><tr><th colspan="2">Non-Compliance</th></tr><tr><td>Status</td><td>OPEN</td></tr><tr><td>Reference</td><td>ed682441-0fc3-44df-a5e0-d858d619ed87</td></tr><tr><td>Clause</td><td>6 - Working hours are not excessive</td></tr><tr><td>Issue Title</td><td>480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive</td></tr><tr><td>Subcategory</td><td>Overtime</td></tr><tr><td>New or carried over?</td><td>☒ New ☐ Carried Over</td></tr><tr><td>Root cause</td><td>☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other</td></tr><tr><td>Root cause - Other</td><td></td></tr><tr><td>Local law issue</td><td>In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.根据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。</td></tr><tr><td>ETI code</td><td>6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.</td></tr><tr><td>Explanation to the non compliance</td><td>It was noted that the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 54 hours in October 2023 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 64-66 hours in March 2024 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 68-70 hours in July 2024 (current paid month). 审核中发现，在抽取的2023年10月份（随机月）的考勤中，所有10名随机抽样员工的月加班时间超过36小时并达到54小时；2024年3月份（随机月）的考勤中，所有</td></tr></table>			Non-Compliance		Status	OPEN	Reference	ed682441-0fc3-44df-a5e0-d858d619ed87	Clause	6 - Working hours are not excessive	Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive	Subcategory	Overtime	New or carried over?	☒ New ☐ Carried Over	Root cause	☐ Training ☒ System ☐ Costs ☐ Lack of workers ☐ Other	Root cause - Other		Local law issue	In accordance with PRC Labor Law article 41, the employer may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.根据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。	ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	Explanation to the non compliance	It was noted that the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 54 hours in October 2023 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 64-66 hours in March 2024 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 68-70 hours in July 2024 (current paid month). 审核中发现，在抽取的2023年10月份（随机月）的考勤中，所有10名随机抽样员工的月加班时间超过36小时并达到54小时；2024年3月份（随机月）的考勤中，所有	
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ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.																										
Explanation to the non compliance	It was noted that the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 54 hours in October 2023 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 64-66 hours in March 2024 (random month), the monthly overtime hours of all 10 randomly selected employees exceeded 36 hours and up to 68-70 hours in July 2024 (current paid month). 审核中发现，在抽取的2023年10月份（随机月）的考勤中，所有10名随机抽样员工的月加班时间超过36小时并达到54小时；2024年3月份（随机月）的考勤中，所有																										

	10名随机抽样员工的月加班时间超过36小时并达到64-66小时；2024年7月份的考勤中（当前发薪月），10名随机抽样的员工中有9名的月加班时间超过36小时并达到68-70小时。	
Follow up method	☒ Follow up audit ☐ Desktop audit	
Timescale	☐ Immediate ☐ 30 days ☒ 60 days ☐ 90 days ☐ 120 days ☐ 180 days ☐ 365 days ☐ Other	
Actions	It is recommended that factory management adopt practices and controls to ensure that employees' overtime hours do not exceed the statutory limits. 建议工厂应采取控制措施确保员工的加班不超过法律规定。	

SMETA Declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Best Practice Guidance and SMETA Measurement Criteria.

- (1) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (2) Any Non-Compliance against customer code alone shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.

Auditor Team			
Lead Auditor:	Nicholas Chen	APSCA Number:	21702056
Additional Auditors:			
Date of declaration:	2024-09-03		

Note: The focus of this ethical audit is on the ETI Base Code and local law. The additional elements will not be audited in such depth or scope, but the audit process will still highlight any specific issues.

Site Representation	
Full Name:	Xu Chunhua
Title:	Production manager
Date of declaration:	2024-09-03
Comments: <i>Any exceptions to this must be recorded here (e.g. different sample size):</i> <i>Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020).</i> <i>The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</i>	
Nil	

Guidance on Root Cause

Explanation of the Root Cause Column

If a non-compliance is to be rectified by a corrective action which will also prevent the non-compliance re-occurring, it is necessary to consider whether a system change is required.

Understanding the root cause of the non-compliance is essential if a site is to prevent the issue re-occurring.

The root cause refers to the specific activity/ procedure or lack of activity /procedure which caused the non-compliance to arise. Before a corrective action can rectify the situation, it is important to find out the real cause of the non-compliance and whether a system change is necessary to ensure the issue will not arise again in the future.

Since this is a new addition, it is not a mandatory requirement to complete this column at this time. We hope to encourage auditors and sites to think about Root Causes and where they are able to agree, this column may be used to describe their discussion.

Some examples of finding a "root cause"

Example 1

Where excessive hours have been noted the real reason for these needs to be understood, whether due to production planning, bottle necks in the operation, insufficient training of operators, delays in receiving trims, etc.

Example 2

A non-compliance may be found where workers are not using PPE that has been provided to them. This could be the result of insufficient training for workers to understand the need for its use; a lack of follow-up by supervisors aligned to a proper set of factory rules or the fact that workers feel their productivity (and thus potential earnings) is affected by use of items such as metal gloves.

Example 3

A site uses fines to control unacceptable behaviour of workers.

International standards (and often local laws) may require that workers should not be fined for disciplinary reasons.

It may be difficult to stop fines immediately as the site rules may have been in place for some time, but to prevent the non-compliance re-occurring it will be necessary to make a system change.

The symptom is fines, but the root cause is a management system which may break the law. To prevent the problem re-occurring it will be necessary to make a system change for example the site could consider a system which rewards for good behaviour

Only by understanding the underlying cause can effective corrective actions be taken to ensure continuous compliance.

The site is encouraged to complete this section so as to indicate their understanding of the issues raised and the actions to be taken.



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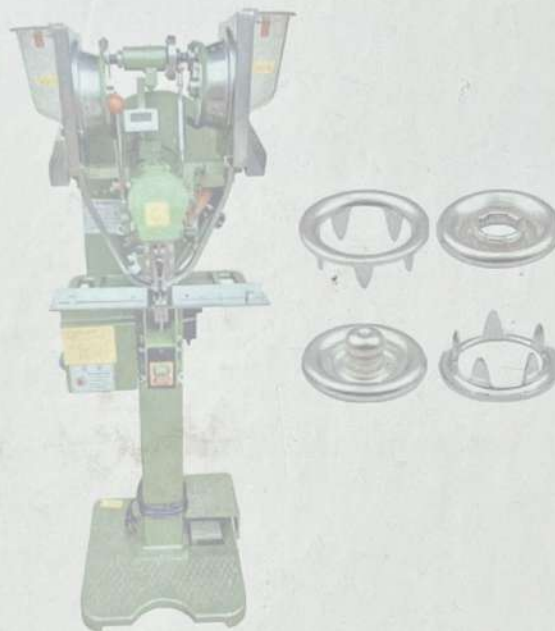
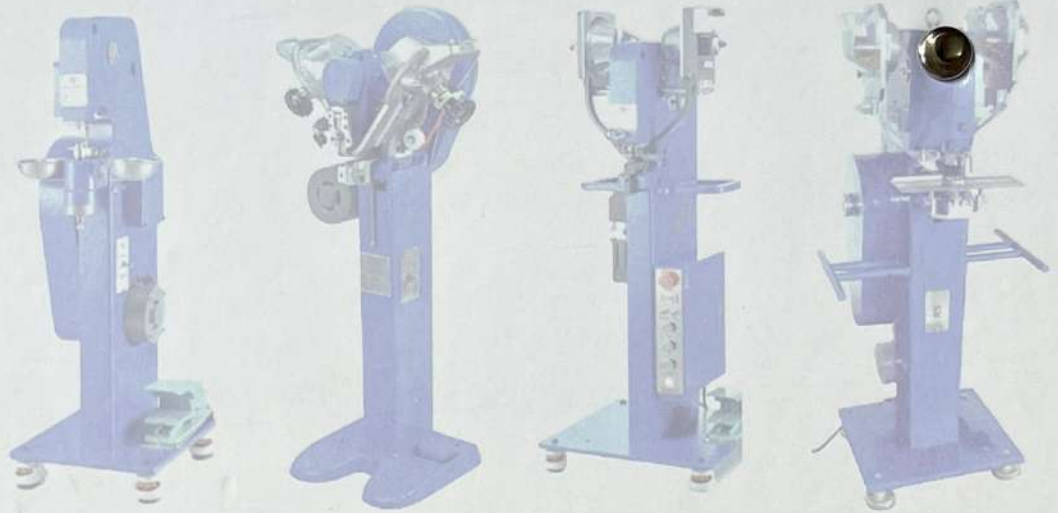
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