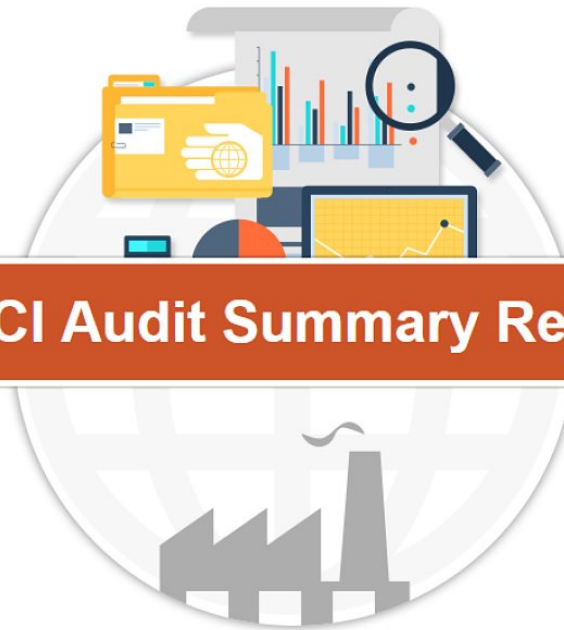

Auditee :	Shenzhen James Audio Technology Co., Ltd.
Audit Date From :	28/02/2017
Audit Date To :	28/02/2017
Expiry Date of the Audit :	Please refer to the producer profile in the BSCI platform
Auditing Company :	ALGI
Auditor's Name(s) :	Eagle Yao(Lead)
Auditing Branch (if applicable) :	ALGI China



BSCI Audit Summary Report

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

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This is an extract of the BSCI Audit Report, which is available in the BSCI Platform. © Foreign Trade Association (FTA), 2013 - The English version is the legally binding One.

Rating Definitions



Rating	A combination of ratings per performance area where:	Consequence																																													
<p>A OUTSTANDING</p>	<p>o Minimum 7 performance area rated A o No Performance area rated C, D or E</p> <p><i>These are three examples:</i></p> <table border="1" style="width: 100%; text-align: center;"> <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></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>A</td><td>A</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>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	A	B	B	B	A	A	A	A	A	A	A	A	B	B	B	B	B	B	B	<p>The auditee has the level of maturity to maintain its improvement process without needing follow-up audit.</p>
A	A	A	A	A	A	A	A	A	A	A	A	A	A	A																																	
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<p>B GOOD</p>	<p>o Maximum 3 performance area rated C o No performance area rated D or E</p> <p><i>These are three examples:</i></p> <table border="1" style="width: 100%; text-align: center;"> <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></tr> <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>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>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	A	A	A	A	A	A	B	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	B	C	C	C	C	<p>The auditee has the level of maturity to maintain its improvement process without needing follow-up audit.</p>
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B	B	B	B	B	B	B	B	B	B	B	C	C	C	C																																	
<p>C ACCEPTABLE</p>	<p>o Maximum 2 performance areas rated D o No performance area rated E</p> <p><i>These are three examples:</i></p> <table border="1" style="width: 100%; text-align: center;"> <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>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>A</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></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>D</td><td>D</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	C	C	C	C	C	A	A	A	A	A	B	B	B	B	C	C	C	C	D	D	C	C	C	C	C	C	C	C	C	C	C	C	C	D	D	<p>The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.</p>
A	A	A	A	A	A	A	A	A	A	C	C	C	C	C																																	
A	A	A	A	A	B	B	B	B	C	C	C	C	D	D																																	
C	C	C	C	C	C	C	C	C	C	C	C	C	D	D																																	
<p>D INSUFFICIENT</p>	<p>o Maximum 6 performance area rated E</p> <p><i>These are three examples:</i></p> <table border="1" style="width: 100%; text-align: center;"> <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></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>E</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>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	A	A	A	B	B	B	C	C	C	D	D	D	D	E	E	D	D	D	D	D	D	D	D	E	E	E	E	E	E	E	<p>The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.</p>
A	A	A	A	A	A	A	A	A	A	D	D	D	D	D																																	
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D	D	D	D	D	D	D	D	E	E	E	E	E	E	E																																	
<p>E UNACCEPTABLE</p>	<p>o Minimum 7 performance areas rated E</p> <p><i>These are three examples:</i></p> <table border="1" style="width: 100%; text-align: center;"> <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></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></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></tr> </table>	A	A	A	A	A	A	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	<p>BSCI participants shall closely oversee the auditee's progress as it may represent a higher risk than other business partners</p>
A	A	A	A	A	A	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																																	
<p>Zero Tolerance</p>	<p>A Zero Tolerance issue was identified (see Annex 5)</p>	<p>Immediate actions are required. The BSCI Zero Tolerance Protocol is to be followed.</p>																																													

Main Auditee Information



Name of producer :	Shenzhen James Audio Technology Co., Ltd.		
DBID number :	347643		
Audit ID :	74548		
Address :	No. 401, 4F, Building A, Rongli Industrial Park, Miaoxi Industrial Zone, Xinghua Community, GuanLan Street, BaoAn District Shenzhen		
Province :	Guangdong	Country :	China
Management Representative :	Mr. Jinbao Zhang/Administrative Manager		
Contact person:	Jinbao Zhang	Sector :	Non-Food
Industry Type :	Mechanical and electrical engineering	Product group :	Other engineering (please specify)
Product Type :	Car FM Transmitters, car MP3 player, car charger and bluetooth car kit, etc		

Audit Details



Audit Range :	<input type="checkbox"/> Full Audit	<input checked="" type="checkbox"/> Follow-up Audit
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced <input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No	
Audit extent (if applicable) :	none	
Audit interferences or contingencies (if applicable) :	none	
Overall rating :	C	
Need of follow-up :	Yes	If YES, by : 28/02/2018

Rating per Performance Area (PA)

PA 1	PA 2	PA 3	PA 4	PA 5	PA 6	PA 7	PA 8	PA 9	PA 10	PA 11	PA 12	PA 13
D	A	A	A	B	D	A	A	A	A	A	B	A

Executive summary of audit report

Shenzhen James Audio Technology Co., Ltd. (Local Name: 深圳市捷美斯音响技术有限公司, Enterprise Registration number: 440306105664526) is located at No. 401, 4F, Building A, Rongli Industrial Park, Miaoxi Industrial Zone, Xinghua Community, GuanLan Street, BaoAn District, Shenzhen City, Guangdong Province, China. The factory was established in 2011 and started its production action at present address since that time. They specialize in production of Car FM Transmitters, car MP3 player, car charger and bluetooth car kit, etc. Main production activities include assembly, inspection and packing. The PCBA process is sub-contracted. As per the management information, their main clients are SCOSHE, Just Wireless and Technaxx, etc.

The factory currently occupies the most part of the 4th floor of one 5-storey building as office, production site and warehouse. No dormitory or catering service is provided to employees. On the audit day, there were total 98 employees in the factory of which 86 employees were production workers. As per management interview, peak season in the factory was not obvious last year.

Based on documents review and management interview, it was noted that all employees in the factory are paid by hourly rate. Wages are paid monthly in cash on around 7th of each month for the preceding month. The factory uses finger-print attendance system to keep record of all employees' working hours. The regular working hours for employees are from 8:30 to 18:00 with lunch break from 12:00 to 13:30. Overtime working would be arranged for 2 hours a day from 19:00 to 21:00 on normal working day if needed and for 8 hours on Saturday if needed.

During the current audit, payroll records from last assessment i.e. March 2016 to January 2017 and attendance records from March 01, 2016 to the assessment day were provided for review. The auditor randomly selected 10 samples from January 2017 (current month) and 5 samples from each of July 2016 (random month) and April 2016 (random month) for verification.

Remark:

- The local legal minimum wage standard has been raised from RMB 1808 per month or equivalent to RMB 10.39 per hour to RMB 2030 per month or equivalent to RMB 11.67 per hour since March 01, 2015.
- Actually, the factory had rented the whole 4th floor of the 5-storey building from the building's owner, but since April 2015, the audited factory rented out a room (No. 402, 500 square meters) to another company named Shenzhen City Shijie HengAn Electronic Co., Ltd. as office, this company is a trading company and belonged to the same boss as well as the audited factory. The lease contract and business license for this company were provided for review at this audit.
- Longhua New District was founded in 2011, the factory located area was belonged to Longhua New District since that time, so the address in the factory business license had been revised as "No. 401, 4F, Building A, Rongli Industrial Park, Miaoxi Industrial Zone, Xinghua Community, GuanLan Street, Longhua New District, Shenzhen City, Guangdong Province, China", but the address in BSCI platform still remained as "No. 401, 4F, Building A, Rongli Industrial Park, Miaoxi Industrial Zone, Xinghua Community, GuanLan Street, BaoAn District, Shenzhen City, Guangdong Province, China", which was named with old district name "BaoAn District".

Ratings Summary



Auditee's background information			
Auditee's name :	Shenzhen James Audio Technology Co., Ltd.	Legal status :	Limited Company
Local Name :	深圳市捷美斯音响技术有限公司	Year in which the auditee was founded :	2011
Address :	No. 401, 4F, Building A, Rongli Industrial Park, Miaoxi Industrial Zone, Xinghua Community, GuanLan Street, BaoAn District	Contact person (please select) :	Jinbao Zhang
Province :	Guangdong	Contact's Email :	360822645@qq.com
City :	Shenzhen	Auditee's official language(s) for written communications :	Chinese Mandarin
Region :	North East Asia	Other relevant languages for the auditee :	None
Country :	China	Website of auditee (if applicable) :	N/A
GPS coordinates :	114.065237,22.713651	Total turnover (in Euros) :	1200000.00
Sector :	Non-Food	Of which exports % :	60.00
Industry :	Mechanical and electrical engineering	Of which domestic market % :	40.00
If other, please specify :	N/A	Production volume :	100,000 pieces per month
Product Group :	Other engineering (please specify)	Production cost calculation :	Yes
If other, please specify :	Car FM Transmitters, car MP3 player, car charger and bluetooth car kit, etc	Lost time injury calculation cost :	No
Product Type :	Car FM Transmitters, car MP3 player, car charger and bluetooth car kit, etc		

Auditee's employment structure at the time of the audit			
Total number of workers :	98	Total number of workers in the production unit to be monitored (if applicable) :	0
	MALE WORKERS	FEMALE WORKERS	
Permanent workers	51	47	
Temporary workers	0	0	
In management positions	7	5	
Apprentices	0	0	
On probation	0	0	
With disabilities	0	0	
Migrants (national citizens)	51	46	
Migrants (foreign citizens)	0	0	
Workers on the permanent payroll	51	47	
Production based workers	51	47	
With shifts at night	0	0	
Unionised	0	0	
Pregnant	-	0	
On maternity leave	-	0	

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: D

Deadline date:28/05/2017

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had set up Management Manual and a series of procedures and policies that states their mission, vision and objectives to match the BSCI Code of Conduct and their dedication to comply with social responsibilities. The established procedures and records had included the overall social responsibility policies which consist of anti-discrimination, freedom of association, no child labor, protection for young workers, wages and benefits, working hours, occupational health and safety, environment protection, anti-corruption and etc.; appointment documents for BSCI affair and various of training records such as legal requirements training, health and safety training and etc. The factory had nominated one senior management, Mr. Jinbao Zhang/Administrative Manager, who had some understanding of BSCI standards, for the establishment, implementation and maintenance of the BSCI system. However, gaps had been identified in implementation: some non-compliance was detected on Performance area Workers Involvement and Protection, Fair Remuneration, Decent Working Hour, Occupational Health and Safety and Protection of Environment. (For details, please refer to Performance Area 2, 5, 6, 7 and 12 respectively.). In addition, deviations was found in the planning of workforce capacity. Please refer to principle 1.4.

整体观察显示, 工厂目前部分履行对该区域的要求。工厂建立了表明其使命、愿景和目标的且符合BSCI行为准则和社会责任需要的管理手册和一系列程序和政策。建立的程序和政策包括总体的社会责任政策比如反歧视、自由结社、不雇佣童工、未成年工保护、工资和福利、工作时间、职业健康安全、环境保护、反腐败等, 以及BSCI事宜任命书, 以及各种培训记录比如法规培训、健康安全培训等。工厂指定了一名对BSCI要求有所了解的高级管理人员(张金宝先生/行政经理)来负责BSCI系统的建立、施行和维护。然而, 在实际执行过程中仍然存在问题; 工厂在工人参与和保护, 公平报酬, 体面的工作时间, 职业健康安全和环境保护方面缺少有效的管理。(详细分别见绩效评估区域第2, 5, 6, 7和12部分。)另外, 在员工产量的规划方面有发现不符合项, 请参见条款1.4。

1.1 - New finding (1st Follow-up Audit on February 28, 2017):

The social management system was not implemented effectively, and some non-compliance was detected on Performance area Workers Involvement and Protection, Fair Remuneration, Decent Working Hour, Occupational Health and safety and Protection of Environment. (For details, please refer to Performance Area 2, 5, 6, 7 and 12 respectively.)

新不符合项(2017年2月28日第一次跟进审核):

充分证据表明工厂在工人参与和保护, 公平报酬, 体面的工作时间, 职业健康安全和环境保护方面缺少有效的管理。(详细分别见绩效评估区域第2, 5, 6, 7和12部分。)

1.4 - Previous Finding (CAP on March 17-18, 2016):

It was noted that the auditee didn't organised workforce capacity property.

Not corrected (1st Follow-up Audit on February 28, 2017):

The factory made production plans for each orders, but the workforce capacity was not properly planned to match delivery order contracts' expectations because monthly overtime working hours exceeded the local limit, please refer to principle 6.2 for details.

前次不符合项(2016年3月17-18日初审):

工厂没有对其产能进行合理规划。

未改善(2017年2月28日第一次跟进审核):

工厂有对每个订单制定生产计划, 但没有正确地对产能进行评估以满足订单的交付预期, 并且工人的月加班时间超过了当地的要求, 详情请参考条款6.2。

Remarks from Auditee:

Nil

Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: C

Deadline date:20/06/2016

Good practices

Areas of improvement

Based on satisfactory evidence, the main auditee partially respect this principle Social Management System, because: 1, It was noted that the auditee didn't organised workforce capacity property. 工厂没有对其产能进行合理规划。

Remarks from Auditee

Performance Area 2 : Workers Involvement and Protection	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:28/05/2017
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>The overall observation showed that the factory partially fulfilled the requirement of this performance area. There were 3 worker' representative in the factory and relevant election procedures and records were provided for review. BSCI Code of Conduct was displayed on the notice board in the production area. All interviewed workers had a good understanding of their rights and responsibilities. Provided documents indicated that the factory provided regular training to workers on their rights and responsibilities and to management staffs as well as workers' representatives on factory rules, human resources, OHS and the grievance mechanism. The factory periodically conducted internal communication meetings with workers and workers' representatives regarding workplace-related issues, and also had set up grievance mechanism which allowed workers to use the mechanism via suggestion box, workers' representatives or senior management directly. Satisfactory evidences had shown that workers knew the channels of reflecting their grievances. However, gaps had been identified in implementation: the understanding for BSCI COC need to improved. Please refer to principle 2.4 for details.</p> <p>整体观察显示, 工厂部分满足该评估区域的要求。工厂选举了4名员工代表, 并提供了相关的选举程序和记录。BSCI行为准则张贴在生产区域的公告栏内。通过员工访谈, 发现所有被访谈员工很清楚自己的权利和义务。所提供的文件资料显示工厂有定期给员工提供关于其权利和义务的培训, 定期给管理人员及员工代表提供关于诸如厂纪厂规, 人力资源、职业健康安全和投诉机制等的培训。工厂定期安排管理层代表和员工以及员工代表就工作场所相关的问题进行内部沟通; 同时, 建立了员工申诉机制, 允许员工通过意见箱、员工代表或者直接找管理者代表反映问题或者意见。充分证据表明员工知道申诉的渠道。然而, 在实际执行过程中仍然存在问题: 对BSCI行为准则的理解需要提高, 详情请参见条款2.4。</p> <p>2.4 - Previous Finding (CAP on March 17-18, 2016): It was noted that the factory didn't have relevant training related to BSCI COC for staff and management person, the staff didn't know BSCI requirements clearly. Not corrected (1st Follow-up Audit on February 28, 2017): It was noted that the factory gave training on BSCI COC to all employees on February 24, 2017, but the interviewed employees still didn't know BSCI requirements clearly.</p> <p>前次不符合项(2016年3月17-18日初审): 工厂没有对相关员工和管理人员进行BSCI COC的培训, 员工对BSCI的要求不是很了解。 未改善(2017年2月28日第一次跟进审核): 工厂于2017年2月24日对所有员工进行BSCI方面的培训, 但访谈的员工对BSCI的要求仍然不是很了解。</p>	
Remarks from Auditee: Nil	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: B	Deadline date:20/06/2016
<u>Good practices</u>	
<u>Areas of improvement</u>	
Based on satisfactory evidence, the main auditee partially respect this principle Workers Involvement and Protection, because: 1, It was noted that the factory didn't have relevant training related to BSCI COC for staff and management person, the staff didn't know BSCI requirements clearly. 工厂没有对相关员工和管理人员进行BSCI COC的培训, 员工对BSCI的要求不是很了解。	
Remarks from Auditee	
Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Not rated 未审核	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u>	
Remarks from Auditee	

Performance Area 4 : No Discrimination	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Not rated 未审核	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u>	
<u>Remarks from Auditee</u>	

Performance Area 5 : Fair Remuneration	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: B	Deadline date:28/05/2017
GOOD PRACTICES: The factory filled out the relevant information in the Fair Remuneration Quick SCAN in the SAQ before this audit. 工厂在本次审核前填写自评表里的公平报酬快速扫描栏目里的相关信息。	
AREAS OF IMPROVEMENT: The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own regulations and rules on wages and benefits based on the legal requirements and BSCI Code of Conduct. As per sampled payroll and attendance records, it was found that the lowest basic wage among samples was RMB 11.67 per hour, which was the same as the local minimum standard RMB 2030 per month or equivalent to RMB 11.67 per hour, and the factory paid 150% and 200% of regular wage rate for overtime hours on weekdays and rest days to workers, which were in compliance with legal requirements. The factory paid wages in cash on time around 7th of each month for the preceding month and pay slips were also provided to workers each month. No monetary fines or other illegal deductions were detected in payroll records. Meanwhile, the factory provided required benefits such as paid annual leave to all eligible workers. However, the gaps have been identified in implementation: some employees' wages could not meet the local basic living wage; and the participating rate and coverage for social insurance did not meet the local requirement. Please refer to principle 5.4 & 5.5 for details. 整体观察表明, 工厂部分履行对该区域要求。工厂基于法律规定和规则以及BSCI行为守则制定了工资和福利制度。根据所抽样员工的工资和考勤记录发现, 在抽样人员中最低的小时工资为RMB 11.67元, 这等于当地的最低工资水平RMB 2030/月, 相当于RMB 11.67/小时, 工厂在工作日加班和周末加班费支付正常工资的150%和200%作为加班费。工厂每月的7号左右以现金方式准时发放工资且有工资条提供。在工资表中没有发现罚款或者其他非法扣款。同时, 工厂为所有符合条件的员工提供了带薪年假。然而, 在实施过程中仍有差距:部分员工工资低于当地的最低生活保障工资;社保参加率不符合当地法规要求。详情请参见条款5.4&5.5。 5.4 - New finding (1st Follow-up Audit on February 28, 2017): Some employees' wages could not meet the local basic living wage. 9 out of 10 selected employees' wages in January 2017 and all the 5 selected employees' wages in July 2016 and April 2016 were paid lower than the local living wage, the living wage standard in Shenzhen City was RMB 3129.4 per month. 新不符合项(2017年2月28日第一次跟进审核): 部分员工工资低于当地的最低生活保障工资。抽查的所有10名员工中有9名在2017年1月的工资和所有抽查的5名员工在2016年7月和2016年4月的工资均低于当地基本生活需求工资, 深圳市的基本生活保障工资为每个月3129.4元。 5.5 - Previous Finding (CAP on March 17-18, 2016): It was noted that only 67 workers had participated in retirement, 86 workers had participated in medical, 86 workers had participated in unemployment insurance, 86 workers had participated in work-related injury, 86 workers had participated in child-bearing insurance. The factory didn't get written waiver obtained from the local social insurance bureau. Not corrected (1st Follow-up Audit on February 28, 2017): As per the social insurance payment receipts of February 2017, there were total 98 employees at that time, but only 76 employees had participated in unemployment, injury, illness and child-bearing insurances, only 66 employees had participated in retirement insurance, and no employee had participated in commercial accident insurance. The factory didn't get written waiver from the local social insurance bureau for this issue. This violated the PRC Labor Law article 72 and 73. 前次不符合项(2016年3月17-18日初审): 在评估中发现, 工厂员工中的67人参加了养老保险, 86人参加了医疗保险, 86人参加了失业保险, 86人参加了工伤保险, 86人参加了生育保险。工厂不能提供地方劳动与社会保障局开具的社会保险豁免批文。 未改善(2017年2月28日第一次跟进审核): 根据2017年2月的社保缴纳记录, 当时共有98名员工, 但只有76员工参加了均参加了失业, 工伤, 医疗和生育保险, 只有66名员工参加了养老保险, 没有员工参加商业意外险。工厂不能提供地方劳动与社会保障局开具的关于这种情况社会保险豁免批文。这违反了《中华人民共和国劳动法》第72条和73条。	
Remarks from Auditee: Nil	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:20/06/2016
Good practices	
Areas of improvement Based on satisfactory evidence, the main auditee partially respect this principle Fair Remuneration, because: 1. It was noted that only 67 workers had participated in retirement, 86 workers had participated in medical, 86 workers had participated in unemployment insurance, 86 workers had participated in work-related injury, 86 workers had participated in child-bearing insurance. The factory didn't get written waiver obtained from the local social insurance bureau. (The PRC Labor Law article 72) 在评估中发现, 工厂员工中的67人参加了养老保险, 86人参加了医疗保险, 86人参加了失业保险, 86人参加了工伤保险, 86人参加了生育保险。工厂不能提供地方劳动与社会保障局开具的社会保险豁免批文。	
Remarks from Auditee	

Performance Area 6 : Decent Working Hours	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: D	Deadline date:28/05/2017
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own working hour regulations and rules based on the legal requirements and BSCI Code of Conduct. As per on site observation and documents review, the factory used finger-print attendance system to keep records of employees' working hours. As per sampled attendance records, it was found that the regular working hours were from 8:30 to 18:00 with lunch break from 12:00 to 13:30. Overtime working would be arranged for 2 hours a day from 19:00 to 21:00 on normal working day if needed and for 8 hours on Saturday if needed. One rest day in every 7-day period was guaranteed. And the factory also provided orientation training to new hired workers about the rules on working hours and etc. However, gaps had been identified in implementation: the monthly overtime working hours exceeded the legal limit, please refer to principle 6.2 for details.</p> <p>整体观察显示, 工厂目前部分履行对该区域的要求。工厂根据法律要求以及BSCI要求建立了工作时间规章制度。工厂采用打指纹的考勤系统记录员工的工作时间包括加班时间。根据所抽样员工的工资和考勤记录发现, 员工的正常工作时间是8:30-18:00, 午休时间是12:00-13:30; 如果生产需要, 会在工作日的19:00至21:00加班2小时, 同样如果需要会在周六加班8小时, 且能确保连续工作六天后休息一天。同时工厂给新进的员工入职培训有包括关于工作时间的规定。然而, 在实际执行过程中仍然存在问题: 月加班工时超过法规限制, 详情请参见条款6.2。</p> <p>6.2 - Previous Finding (CAP on March 17-18, 2016): It was noted that the factory did not comply with the national statutory regulations with regards to the maximum amount of monthly overtime hours. Factory monthly overtime in April of 2015, December of 2015 and February of 2016 for are 74, 78 and 38 hours.</p> <p>Not corrected (1st Follow-up Audit on February 28, 2017): The overtime working hours exceeded the upper limit 36 hours per month. In January 2017 (current month), the monthly overtime hours of all 10 randomly selected employees were 52 hours; in July 2016 (random month), the monthly overtime hours of all 5 randomly selected employees were 82 hours; in April 2016 (random month), the monthly overtime hours of all 5 randomly selected employees were from 66 to 80 hours. This violated the PRC Labor Law article 41.</p> <p>前次不符合项(2016年3月17-18日初审): 在评估中发现, 工厂没有遵守国家法律规定的月最大加班时数规定。2015年4月, 2015年12月和2016年2月的月加班时间分别为74, 78和38小时。</p> <p>未改善(2017年2月28日第一次跟进审核): 月加班工时超过36小时。2017年1月(当前月), 10名被抽查员工的月加班工时均为52小时; 2016年7月(随机月), 所有5名被抽查员工的月加班工时均为82小时; 2016年4月(随机月), 所有5名被抽查员工的月加班工时为66-80小时。这违反了《中华人民共和国劳动法》第41条。</p>	
Remarks from Auditee: Nil	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: D	Deadline date:20/06/2016
<u>Good practices</u>	
<u>Areas of improvement</u>	
Based on satisfactory evidence, the main auditee partially respect this principle Decent Working Hours, because: 1, It was noted that the factory did not comply with the national statutory regulations with regards to the maximum amount of monthly overtime hours. Factory monthly overtime in April of 2015, December of 2015 and February of 2016 for are 74, 78 and 38 hours. (The PRC Labor Law article 41)在评估中发现, 工厂没有遵守国家法律规定的月最大加班时数规定。2015年4月, 2015年12月和2016年2月的月加班时间分别为74, 78和38小时。	
<u>Remarks from Auditee</u>	

Performance Area 7 : Occupational Health and Safety

1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A

Deadline date:28/05/2017

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation showed that the factory partially fulfilled the requirement of this performance area. The factory had made its own health and safety regulations and rules based on the legal requirements and BSCI Code of Conduct and also established OHS committee. The factory had appointed specialized management staff to take charge of the OHS affairs and provided periodical health and safety training to workers regarding such as medical emergency treatment, PPE usage, chemical safety, machine operation, fire drill exercises and etc. Furthermore, the factory provided a safe and comfortable working environment to workers: installing sufficient fire equipment, inspecting the fire equipment and facilities on a monthly basis, providing sufficient toilets, first aid kits, and qualified drinking water, and etc. However, gaps had been identified in implementation. Please refer to corresponding principle for details.

Remark:

1. 7.21: The factory currently did not provide kitchen and canteen to workers.
2. 7.23: The factory currently did not provide transportation to workers.

整体观察显示, 工厂目前部分履行对该区域的要求。工厂根据法律要求以及BSCI的要求建立了健康安全规定和守则, 同时也建立了环境健康安全委员会。工厂委任专门的管理层代表负责健康安全事宜并定期给员工举行关于健康安全的培训, 比如医疗救护培训、个人防护用品培训、化学品安全培训、机器设备操作培训、消防演习等。另外, 工厂给员工提供了安全的工作环境, 比如提供了足够的消防设备、对消防设备和器材等每月进行检查、提供了足够的洗手间、急救药箱、合格的饮用水等。然而, 在实际执行过程中仍然存在问题, 详情请参见对应的条款。

备注:

1. 7.21: 工厂目前没有给员工提供餐厅和食堂。
2. 7.23: 工厂目前没有给员工提供交通工具。

7.2 - New finding (1st Follow-up Audit on February 28, 2017):

Only 76 out of 98 employees had participated in injury insurance, and no employee had participated in commercial accident insurance. This violated the PRC Labor Law article 72 and 73.

新不符合项(2017年2月28日第一次跟进审核):

目前工厂98名员工中只有76名员工参加了工伤保险, 而且没有员工参加商业意外险。这违反了《中华人民共和国劳动法》第72条和73条。

7.3 - New finding (1st Follow-up Audit on February 28, 2017):

1. The factory did not provide occupational health check to the 10 out of 15 soldering workers and 4 production cleaning workers who exposed to waste soldering smoke or used chemical during production. This violated the PRC Law of Prevention and Control of Occupational Diseases article 36.

2. There was waste soldering smoke in the production workshop when soldering, but the factory did not conduct the occupational hazards factors testing for soldering smoke dust. This violated the Provisions on the Supervision and Administration of Workplace Occupational Health Article 20.

3. The risk assessment did not include the risks of the areas with high risk such as soldering and product cleaning workstations where were found with waste soldering smoke or chemical used and needed to wear relevant personal protective equipment.

新不符合项(2017年2月28日第一次跟进审核):

1. 工厂没有给15名焊锡的工人中的10名和4名产品清洁的工人(生产时会接触到焊锡废烟或使用化学品)提供职业健康体检。这违反了《中华人民共和国职业病防治法》第三十六条。

2. 生产车间在焊锡时会产生焊锡烟尘, 但工厂没有针对焊锡废烟尘进行职业危害因素检测。这违反了《工作场所职业卫生监督管理规定》第二十条。

3. 工厂的风险评估没有包含高风险岗位如焊接和产品清洁工序(这些工位有焊接烟尘或用到化学品, 需要佩戴劳保用品)。

7.6 - New finding (1st Follow-up Audit on February 28, 2017):

Through on-site observation, the factory provided active carbon masks instead of dust-proof masks to all soldering workers, moreover, two product cleaning workers did not wear the provided active carbon mask. This violated the Law of the PRC on Work Safety article 42.

新不符合项(2017年2月28日第一次跟进审核):

现场审核时发现, 工厂给所有焊锡工人提供的是活性炭口罩而非防尘口罩, 而且2名产品清洁的工人没有佩戴工厂提供的活性炭口罩。这违反了《中华人民共和国安全生产法》第42条的规定。

7.7 - New finding (1st Follow-up Audit on February 28, 2017):

1. The cleaning solvent storage area was not posted with relevant MSDS. This violated the Regulations on the Safety Management of Dangerous Chemicals, Article 15.

2. The bottles of all cleaning solvent at assembly line were not identified with danger. This violated the the Regulation of Chemical Safety Usage in Workplace, Article 19.

新不符合项(2017年2月28日第一次跟进审核):

1. 产品清洁剂存放的地方没有张贴相应的MSDS。此项违反了《危险化学品安全管理条例》第十五条。

2. 组装线上所有盛装产品清洁剂的瓶子均没有标识清洁剂的危害性。这违反了《工作场所安全使用化学品规定》(劳部发[1996]423号)第19条。

7.8 - Previous Finding (CAP on March 17-18, 2016):

It was noted that the factory didn't display the accident and emergency procedure to communicate with staff.

Corrected (1st Follow-up Audit on February 28, 2017):

Through on-site observation, it was noted that the factory had posted the accident and emergency procedure at production site to communicate with staff.

前次不符合项(2016年3月17-18日初审):

工厂没有张贴意外和事故程序和员工沟通。

已改善(2017年2月28日第一次跟进审核):

现场观察时发现, 工厂已在生产现场张贴了意外和事故程序以便和员工沟通。

7.9 - Previous Finding (CAP on March 17-18, 2016):

1. It was noted that the factory didn't post notice to alarm staff wear mask in the workshop.

2. It was noted that no warning sign was equipped for several electric control stations in the workshop.

Corrected (1st Follow-up Audit on February 28, 2017):

1. Through on-site observation, the factory had posted the mask need reminding notice through the assembly lines to alarm the relevant workers to

<p>wear masks. 2. Through on-site observation, all electric control stations were posted with shock warning signs.</p> <p>前次不符合项(2016年3月17-18日初审): 1. 工厂没有为车间的工人张贴警示性标语提醒员工佩戴口罩。 2. 在评估中发现, 车间的几个配电箱没有警示标识。</p> <p>已改善(2017年2月28日第一次跟进审核): 1. 现场审核时发现, 工厂在组装线上张贴了需要佩戴口罩的警示性标语提醒相关员工佩戴口罩。 2. 现场审核时发现, 所有的配电箱均张贴了触电警示标识。</p> <p>7.13 - Previous Finding (CAP on March 17-18, 2016): It was noted that 90% of the switches in the workshop were not equipped with safety guard.</p> <p>Not corrected (1st Follow-up Audit on February 28, 2017): Through on-site observation, 80% electrical switch boxes were found without outer safety guards. This violated Safety code of electric power industry —Part 1: Thermal and machine Article 3.5.5.</p> <p>前次不符合项(2016年3月17-18日初审): 车间90%电源开关没有安全防护装置。</p> <p>未改善(2017年2月28日第一次跟进审核): 现场审核时发现, 工厂约80%的电开关没有外保护盖。这违反了《电业安全工作规程第1部分: 热力和机械》第3.5.5条。</p>
<p>Remarks from Auditee: Nil</p>
<p>Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A Deadline date:20/06/2016</p>
<p><u>Good practices</u></p>
<p><u>Areas of improvement</u></p> <p>Based on satisfactory evidence, the main auditee partially respect the principle Occupational Health and safety, because: 1. It was noted that the factory didn't post notice to alarm staff wear mask in the workshop. (the Safety Manufacturing Law article 37) 工厂没有为车间的工人张贴警示性标语提醒员工佩戴口罩。2. It was noted that the factory didn't display the accident and emergency procedure to communicate with staff. 工厂没有张贴意外和事故程序和员工沟通。3. It was noted that no warning sign was equipped for several electric control stations in the workshop. (the PRC Factory Safety and Sanitary Regulations article 41) 在评估中发现, 车间的几个配电箱没有警示标识。4. It was noted that 90% of the switches in the workshop were not equipped with safety guard. (PRC Factory Safety and Sanitary Regulations article 41) 车间3个电源开关没有安全防护装置。</p>
<p>Remarks from Auditee</p>
<p>Performance Area 8 : No Child Labour</p>
<p>1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A Deadline date:</p>
<p>GOOD PRACTICES: None</p>
<p>AREAS OF IMPROVEMENT: Not rated 未审核</p>
<p>Remarks from Auditee: N/A</p>
<p>Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A Deadline date:</p>
<p><u>Good practices</u></p>
<p><u>Areas of improvement</u></p>
<p>Remarks from Auditee</p>

Performance Area 9 : Special protection for young workers	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Not rated 未审核	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u>	
<u>Remarks from Auditee</u>	
Performance Area 10 : No Precarious Employment	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Not rated 未审核	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u>	
<u>Remarks from Auditee</u>	
Performance Area 11 : No Bonded Labour	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Not rated 未审核	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: A	Deadline date:
<u>Good practices</u>	
<u>Areas of improvement</u>	
<u>Remarks from Auditee</u>	

Performance Area 12 : Protection of the Environment	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: B	Deadline date:28/05/2017
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: <p>Based on satisfactory evidence, the auditee partially fulfilled the principle of Protection of the Environment. The factory had collected the relevant laws and regulations for environmental protection. The factory had filled out the Environmental Impact Registration Form and obtained the environmental impact assessment approval. However, the factory didn't have the risk assessment for the significant impacts and environmental implications, please refer to principle 12.1 for details.</p> <p>基于满意的证据, 认为工厂部分满足保护环境的执行领域。工厂收集了与环境保护有关的法律法规, 工厂填报了环境影响登记表并获得了批复。但工厂没有进行关于生产对环境产生影响的风险评估, 详情请参考条款12.1。</p> <p>12.1 - Previous Finding (CAP on March 17-18, 2016): It was noted that the factory didn't have the risk assessment for the significant impacts and environmental implications associated to its activity. Not corrected (1st Follow-up Audit on February 28, 2017): Through interview with management and documents review, it was noted that the factory still didn't have the risk assessment for the significant impacts and environmental implications associated to its activity.</p> <p>前次不符合项(2016年3月17-18日初审): 工厂没有提供关于生产对环境产生影响的风险评估。 未改善(2017年2月28日第一次跟进审核): 通过与管理层的访谈和文件审核, 得知工厂依然没有提供关于生产对环境产生影响的风险评估。</p>	
Remarks from Auditee: Nil	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: B	Deadline date:20/06/2016
Good practices	
Areas of improvement <p>Based on satisfactory evidence, the main auditee partially respect this principle Protection of the Environment, because: 1, It was noted that the factory didn't have the risk assessment for the significant impacts and environmental implications associated to its activity. 工厂没有提供关于生产对环境产生影响的风险评估。</p>	
Remarks from Auditee	

Performance Area 13 : Ethical Business Behaviour	
1- Followup Audit [Audit Id - 74548] Audit Date: 28/02/2017 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: None observed The overall observation showed that the factory currently fulfilled the requirement of this performance area. The factory had identified the situations and activities where act of corruption, extortion and embezzlement were most likely to occur and developed relevant policies and procedures against them and provided relevant training to all employees. During the audit process, all required documents were provided timely and as per cross checking, no inconsistent or falsified information was detected. The factory also established a set of procedures to avoid, investigate and discipline any fraud, falsification and misrepresentation in the supply chain. Further, the factory collected and processed workers' personal data with respect for privacy. 无不符合项发现 整体观察显示, 工厂目前满足该区域的要求。工厂识别了各种可能存在贪污、勒索和侵占的情形及行为并制定了相关的反腐败、反贪污的政策和程序并给所有员工提供了相关的培训。在审核过程中, 工厂及时提供了所要求的所有文件和信息且在交叉核对时没有发现不一致或者伪造的信息。同时, 工厂建立了一系列程序以避免、调查和惩罚任何欺骗、伪造及虚假陈述的行为。此外, 在收集和处理员工的个人信息时, 工厂确保了对个人隐私的保护。 13.1 - Previous Finding (CAP on March 17-18, 2016): It was noted that the factory didn't have training related to ethics and integrity for workers and managers. Corrected (1st Follow-up Audit on February 28, 2017): Through documents review and interview with management and employees, the factory had provided training regarding ethics and integrity policy to all employees on February 27, 2017. 前次不符合项(2016年3月17-18日初审): 工厂没有为员工和管理人员提供道德和诚信度的培训。 已改善(2017年2月28日第一次跟进审核): 根据与管理层和员工的面谈和文件审核, 得知工厂在2017年2月27日给所有员工提供道德和诚信度的培训。	
Remarks from Auditee: N/A	
Full Audit [Audit Id - 44911] Audit Date: 17/03/2016 PA Score: B	Deadline date:20/06/2016
Good practices	
Areas of improvement Based on satisfactory evidence, the main auditee partially respect this principle Ethical Business Behaviour, because: 1. It was noted that the factory didn't have training related to ethics and integrity for workers and managers. 工厂没有为员工和管理人员提供道德和诚信度的培训。	
Remarks from Auditee	

Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Follow-up Audit	28/02/2017	74548	D	A	A	A	B	D	A	A	A	A	A	B	A	C
Full Audit	17/03/2016	44911	C	B	A	A	A	D	A	A	A	A	A	B	B	C

Producer Photos



External photo(s) of the production unit(s)
reception area.JPG



Photo of fire safety equipment
lighting evacuation arrow.JPG



Photo of the inside of the main production hall
hardware and plastic parts storage.JPG



External photo(s) of the production unit(s)
gate of industrial park.JPG



Photo of fire safety equipment
marked evacuation route.JPG



Photo of the inside of the main production hall
idle assembly line 1.JPG



External photo(s) of the production unit(s)
main entrance of the production building.JPG



Photo of fire safety equipment
no smoking warning sign.JPG



Photo of the inside of the main production hall
idle assembly line 2.JPG



External photo(s) of the production unit(s)
name and house number of the industrial park.JPG



Photo of fire safety equipment
sprinkler.JPG



Photo of the inside of the main production hall
storage of electronic parts.JPG



External photo(s) of the production unit(s)
production building.JPG



Photo of non-conformity
NC-electrical switch box was without outer cover.JPG



Photo of the inside of the main production hall
storage of finished goods.JPG



External photo(s) of the production unit(s)
security guard room of industrial park.JPG



Photo of non-conformity
NC-no MSDS at the storage area of cleaning solvent.JPG



Photo of the inside of the main production hall
storage of packing material.JPG



Photo first aid facilities
first aid kit.JPG



Photo of non-conformity
NC-product cleaning worker did not wear the provided active carbon mask.JPG



Photo of the inside of the main production hall
storage of semi-finished products.JPG



Photo of chemical storage room (if applicable)
cleaning solvent stored in a anti-leakage cabinet.JPG



Photo of non-conformity
NC-the cleaning solvent at assembly line was not identified with its danger.JPG



Photo of the inside of the main production hall
suggestion box.JPG



Photo of fire safety equipment
electrical switch box with outer safety guard and shock warning sign.JPG



Photo of non-conformity
NC-the factory provided active carbon instead of dust-proof mask to soldering worker.JPG



Photo of the personal protection equipments (if applicable)
eye washing facility.JPG



Photo of fire safety equipment
electricity distribution box.JPG



Photo of the code of conduct on display
bulletin board with BSCI COC.JPG



Photo of the sanitary facilities
drinking water.JPG



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



Photo of the inside of the main production hall seageing area.JPG



Photo of the sanitary facilities hand washing area.JPG



Photo of fire safety equipment explosion-proof light in warehouse.JPG



Photo of the inside of the main production hall assembly line 1.JPG



Photo of the sanitary facilities toilet.JPG



Photo of fire safety equipment fire alarm.JPG



Photo of the inside of the main production hall assembly line 2.JPG



Photo of the personal protection equipments (if applicable) Corrected for last audit-mask need reminding notice on assembly line.JPG



Photo of fire safety equipment fire extinguishers.JPG



Photo of the inside of the main production hall in-line test and inspection.JPG



Photo of fire safety equipment Corrected for last audit-warning sign posted on electric control station.JPG



Photo of fire safety equipment fire hydrant.JPG



Photo of the inside of the main production hall repairing workstation.JPG



Photo of the code of conduct on display Corrected for last audit-factory had posted and displayed the accident and emergency procedure at production site.JPG

