

# Sedex Members Ethical Trade Audit Report

Version 7



# Contents

[Audit content](#)

[Audit details](#)

[SMETA declaration](#)

[Summary of findings](#)

[Management systems](#)

[Site details and data points](#)

[Site details](#)

[Worker analysis](#)

[Worker interviews](#)

[Measure workplace impact](#)

[0. Enabling accurate assessment](#)

[1. Employment is freely chosen](#)

[1.A. Responsible recruitment and entitlement to work](#)

[2. Freedom of association and right to collective bargaining are respected](#)

[3. Working conditions are safe and hygienic](#)

[4. Child labour shall not be used](#)

[5. Legal wages are paid](#)

[5.A. Living wages are paid](#)

[6. Working hours are not excessive](#)

[7. No discrimination is practiced](#)

[8. Regular employment is provided](#)

[8.A. Sub-contracting and homeworkers are used responsibly](#)

[9. No harsh or inhumane treatment is allowed](#)

[10.A. Environment 2-Pillar](#)

[Attachments](#)

## Audit content

**(1)** A SMETA audit was conducted which included some or all of labour standards, health and safety, environment and business ethics. The SMETA minimum requirements were applied and the SMETA auditor manual was followed. The scope of workers included all types at the site e.g. direct employees, agency workers, workers employed by service providers and workers provided by other contractors. Any deviations from the SMETA methodology are stated (with reasons for deviation) in the SMETA declaration.

The audit scope includes an assessment of the Workplace Requirements and the Management Systems Assessment against the code areas below.

### 2-pillar audits include:

- Labour standards:
  - 0. Enabling accurate assessment
  - 1. Employment is freely chosen
    - 1.A. Responsible recruitment and entitlement to work
  - 2. Freedom of association and right to collective bargaining are respected
  - 4. Child labour shall not be used
  - 5. Legal wages are paid
    - 5.A. Living wages are paid
  - 6. Working hours are not excessive
  - 7. No discrimination is practiced
  - 8. Regular employment is provided
    - 8.A. Sub-contracting and homeworkers are used responsibly
  - 9. No harsh or inhumane treatment is allowed
- Health and safety:
  - 3. Working conditions are safe and hygienic
- Environment:
  - 10.A. Environment 2-pillar

### 4-pillar audits include, in addition to the above:

- Environment:
  - 10.B. Environment 4-pillar
- Business ethics:
  - 10.C. Business ethics

**(2)** Where appropriate, non-compliances or non-conformances were raised where either local law or the base code were not met, and recorded as non-compliances on both the audit report, CAPR and on the Sedex Platform.

**(3)** Any non-conformance against customer code shall not be uploaded to Sedex, but sent directly to the customer in question.

# Audit details

## Site details

<b>Sedex site reference</b>	ZS1000091068	<b>Site name</b>	Wuhu Tianling Garment Co Ltd
<b>Business name</b>	Wuhu Tianling Garment Co Ltd	<b>Site address</b>	Garment Industrial Park, Suncun Town, Fanchang District, Wuhu, Anhui, China Wuhu CN 241006

## Audit details

<b>Sedex company reference</b>	ZC5000076750	<b>Auditor company name</b>	LRQA
<b>Audit company address</b>	16th Floor, Cambridge House, Taikoo Place, 979 King's Road Quarry Bay, Hong Kong SAR, HK, HK		
<b>Date of audit</b>	2025-11-10	<b>Audit conducted by</b>	Cathy Wei
<b>Audit pillars</b>	Labour Standards   Health and safety		
<b>Time in and out</b>	Day 1		
	In	09:00	
	Out	17:00	
<b>Audit type</b>	Full initial		
<b>Was the audit announced?</b>	Semi announced		

[← Contents](#)

[Findings →](#)

Was the Sedex SAQ available for review?	Yes
Who signed and agreed CAPR?	Yang Yiqin / Manager
Any conflicting information SAQ/Pre-Audit Info	No
Is further information available?	No

## Audit attendance

	Senior management	Worker representative	Union representative
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
Reason for absence at the opening meeting	N/A. No union was established in the factory.		
Reason for absence during the audit	N/A. No union was established in the factory.		
Reason for absence at the closing meeting	N/A. No union was established in the factory.		

# SMETA declaration

## Auditor team

### SMETA declaration

I declare that the audit underpinning the following report was conducted in accordance with SMETA Minimum Requirements and the SMETA Auditor Manual.

1. Where appropriate non-compliances/ non-conformances were raised against the Base Code and local law and recorded as non-compliances/ non-conformances on both the audit report, CAPR and on the Sedex Platform.
2. Any non-conformance against customer code alone shall not be uploaded to Sedex, and will be shared directly with the customer in question.

This report provides a summary of the findings and other applicable information found/gathered during the social audit conducted on the above date only and does not officially confirm or certify compliance with any legal regulations or industry standards. The social audit process requires that information be gathered and considered from records review, worker interviews, management interviews and visual observation. More information is gathered during the social audit process than is provided here. The audit process is a sampling exercise only and does not guarantee that the audited site prior, during or post-audit, are in full compliance with the Code being audited against. The provisions of this Code constitute minimum and not maximum standards and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable laws and where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection. The ownership of this report remains with the party who has paid for the audit. Release permission must be provided by the owner prior to release to any third parties.

### Any exceptions to the SMETA Methodology must be recorded here (e.g. different sample size)

Audit window: Nov 10, 2025 to Dec 7, 2025

### Lead auditor

Cathy Wei

### APSCA Number

21702065

### Additional auditor

### Date of declaration

2025-11-10

[← Contents](#)

[Findings →](#)

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## Site representation

<b>Declaration</b>	I acknowledge that details from this report can change during the review process and that I will be given the opportunity to dispute the content once the review has been published.
<b>Full name</b>	Yang Yiqin
<b>Title</b>	Manager
<b>Date of declaration</b>	2025-11-10

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
<b>3. Working conditions are safe and hygienic</b>	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF601184957</a>
<b>5. Legal wages are paid</b>	5.B Ensure that workers receive the insurance...	Local law Base code	NC <a href="#">ZAF601184958</a>
<b>6. Working hours are not excessive</b>	6.F Ensure that where overtime is used, it is...	Local law Base code	NC <a href="#">ZAF601184959</a>

# Management systems

	Policies and procedures	Resources	Communication and training	Monitoring
1. Employment is freely chosen				
1.A. Responsible recruitment and entitlement to work				
2. Freedom of association and right to collective bargaining are respected				
3. Working conditions are safe and hygienic				
4. Child labour shall not be used				
5. Legal wages are paid				
6. Working hours are not excessive				
7. No discrimination is practiced				
8. Regular employment is provided				

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

[← Summary of findings](#)

[Site details →](#)

	Policies and procedures	Resources	Communication and training	Monitoring
8.A. Sub-contracting and homeworkers are used responsibly				
9. No harsh or inhumane treatment is allowed				
10.A. Environment 2-Pillar				

Not addressed

Fundamental improvements required

Some improvements recommended

Robust management systems

# Site details

## Company and site details

<b>Sedex company reference</b>	ZC5000076750	
<b>Sedex site reference</b>	ZS1000091068	
<b>Company name</b>	Wuhu Tianling Garment Co Ltd	
<b>Business ownership type</b>	GOODS	
<b>Site name</b>	Wuhu Tianling Garment Co Ltd	
<b>Site name in local language</b>	芜湖天翎服饰有限公司	
<b>GPS location</b>	<b>GPS address</b>	Garment Industrial Park, Suncun Town, Fanchang District, Wuhu, Anhui, China
	<b>Coordinates</b>	N 31°15'19" E 118°24'25"
<b>Is the worksite in a remote location, far from habitation?</b>	No	
<b>Site contact</b>	<b>Contact name</b>	Mr. Wu Yongfeng
	<b>Job title</b>	Manager
	<b>Phone number</b>	18055357799
	<b>Email</b>	18055357799@163.com
<b>Applicable business and other legally required business license numbers and documents</b>	<p>Business license number: 91340222MAEPGL149M  Valid date: Jun 24, 2025 to long term  Fire safety approval: Fan Gong Xiao Yan Zi [2006] No.015, issue date: Apr 12, 2006.  Structural safety approval: no license No., issue date: Mar 13, 2006.  Fixed pollution source discharge registration receipt: 91340222MAEPGL149M001Y, issue date: Nov 7, 2025.</p>	

[← Management systems](#)

[Worker analysis →](#)

## Site activities

<b>Site function</b>	Finished Product Supplier	
<b>Site activities</b>	<b>Primary</b>	Manufacture of wearing apparel (clothing), except fur apparel
	<b>Secondary</b>	
	<b>Other</b>	
<b>Product type</b>	Garments	
<b>Process overview</b>	Products: garments Main operations: cutting, sewing, ironing, inspection and packing No. of production lines: nil Main equipment used: sewing machines, irons, etc.	
<b>What level of mechanization best describes the work at this site?</b>	Fair mechanisation / manual Labour	

## Site scope

<b>Is the audited site a physically continuous area?</b>	Yes	
<b>What is the area of audited site to its boundary?</b>	3300m <sup>2</sup>	
<b>Building 1</b>	<b>Last construction works on site</b>	2006
	<b>If building is shared, provide details</b>	N/A
	<b>Number of floors</b>	1
	<b>Description of floor activities</b>	Raw materials warehouse

[← Management systems](#)

[Worker analysis →](#)

## Site scope

Building 2	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Accessory Warehouse
Building 3	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Cutting section
Building 4	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Sewing section
Building 5	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Ironing, inspection and packing sections and finished goods warehouse
Building 6	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	1
	Description of floor activities	Canteen and kitchen

[← Site details](#)

[Worker analysis →](#)

## Site scope

Building 7	Last construction works on site	2006
	If building is shared, provide details	N/A
	Number of floors	2
	Description of floor activities	1st-2nd floor: office

Is there any difference between the site scope of the audit and the Sedex site profile?

No

Does the scope of the audit subdivide any building or is limited to particular processes, products or businesses within the physical site?

No

Is any activity conducted onsite not included within the scope of the audit?

No

## Worker accommodation and transport

Are there any site-provided worker accommodation buildings?

No

Does the site organise worker transport to the worksite?

Not applicable

No legal requirement on transport.

[← Site details](#)

[Worker analysis →](#)

## Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	95-100%
	March	95-100%	April	95-100%
	May	95-100%	June	95-100%
	July	95-100%	August	95-100%
	September	95-100%	October	95-100%
	November	95-100%	December	95-100%

Is there any night shift work at the site? No

## Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact? No

Has the site assessed for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community? Yes  
The factory has conducted those negative impacts assessment each year in their internal audit.

Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site? Yes  
The factory had established and implemented Human Rights Impact Assessment system and conducted the HRIA once per year in their internal audit.

[← Site details](#)

[Worker analysis →](#)

# Worker analysis

Gender disaggregated data available      Men and women

## Worker totals

	Men	Women	Other	Total
Number of workers	16 (19.8%)	65 (80.2%)	- -	81 (100%)

## Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	16 (19.8%)	65 (80.2%)	- -	81 (100%)
Temporary or fixed term employees	0 -	0 -	- -	0 (0%)
Agency or subcontracted workers	0 -	0 -	- -	0 (0%)
Seasonal workers	0 -	0 -	- -	0 (0%)
Self-employed workers	0 -	0 -	- -	0 (0%)
Informal workers including home workers	0 -	0 -	- -	0 (0%)
Apprentices, trainees or interns	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Site details](#)

[Worker interviews →](#)

## Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	0 -	0 -	- -	0 (0%)
International migrant workers	0 -	0 -	- -	0 (0%)
Total migrant workers	0 -	0 -	- -	0 (0%)

\* % of total workforce

Where workers have migrated internally, list the most common internal states workers have moved from

N/A. All workers were local citizens.

## Workers by age

	Men	Women	Other	Total
18 - 24 years old	0 -	0 -	- -	0 (0%)
15 - 17 years old	0 -	0 -	- -	0 (0%)
Under 15 years old	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

Is the worker analysis data relevant for peak season and current to the audit? No

Describe how this may vary during peak periods There was no obvious peak or non-peak month in the factory.

Please list the nationalities of all workers, with the three most common nationalities listed first Chinese

### Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	20%	80%	-	100%

### Workers by remuneration type

	Men	Women	Other	Total
Workers paid per unit (piece rate)	0 -	0 -	- -	0 (0%)
Workers paid based on a mix of 'piece work' and hourly rate	0 -	0 -	- -	0 (0%)
Workers paid hourly / daily rate	16 (19.8%)	65 (80.2%)	- -	81 (100%)
Salaried workers	0 -	0 -	- -	0 (0%)

\* % of total workforce

[← Worker analysis](#)

[Worker interviews →](#)

## Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -	- -	0 (0%)
Paid weekly	0 -	0 -	- -	0 (0%)
Paid monthly	16 (19.8%)	65 (80.2%)	- -	81 (100%)
Other	0 -	0 -	- -	0 (0%)

\* % of total workforce

If other payment cycle entered, please provide details N/A

## People in managerial, supervisory and administrative roles

	Men	Women	Other	Total
Employees in management positions	2 (50%)	2 (50%)	- -	4
Supervisors or team leaders	1 (100%)	0 (0%)	- -	1
Administrative staff	2 (20%)	8 (80%)	- -	10

[← Worker analysis](#)

[Worker interviews →](#)

## Worker interview summary

Gender disaggregated data available      Men and women

Which methods of worker engagement were used?      Individual interviews  
Group interviews

### Digital worker survey participants

	Men	Women	Other	Total
Number of workers	-	-	-	-

Were any of the audit findings attributable to the survey?

Was the interview sample representative of all types of nationality and employment types of workers?      Yes

Was the interview sample representative of the gender composition of the workforce?      Yes

Number and size of group interviews      1 group of 5 workers

Did workers understand the purpose of the audit?      Yes

Were interviews conducted in circumstances to ensure privacy, with the confidentiality of the interview process communicated to the workers?      Yes

Was there any indication that workers had been 'coached' in how they should respond to questions?

No

What was the general attitude of the workers towards their workplace?

Favorable

### Attitude of workers

In which areas did workers raise significant concerns or complaints?

Other (provide details)

Nil

What did the workers like the most about working at this site?

Equal opportunities  
Freedom of movement  
Overtime

Additional comments

Monthly wage could be paid on time and workers could easily leave even during working day.

Attitude of workers' committee/union representatives

One worker representative attended the whole assessment process. She/he was open to assessor, who stated that they were elected by workers. Workers could raise suggestion or complaint through worker representative meeting. They would participate in grievance solution.

Attitude of managers

Factory management were cooperative with LRQA staff and provided full access to the whole facility. Management provided required documents and records in time, accompanied assessors with factory tour and helped select workers for interviews. Management staff attended the closing meeting, confirmed all the findings and signed on the CAPR without any argument.

### Workers interviewed by type

	Total
Permanent workers	10

## Workers interviewed by type

Temporary or fixed-term employees	0
Agency or subcontracted workers	0
Seasonal workers	0
Other workers	0
<b>Total number of workers interviewed</b>	<b>10</b>

## Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	1	4	-	5
Workers interviewed individually	2	3	-	5

## Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	0	0	-	0
International migrant workers interviewed	0	0	-	0
<b>Total migrant workers interviewed</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>0</b>

# Measuring workplace impact

Gender disaggregated data available      Men and women

## Annual worker turnover (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	1.0%	-	1.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Number of workers leaving in last 12 months as a % of average total number of workers on site over the year.

## Rate of absenteeism (%)\*

	Men	Women	Other	Total
Last full quarter (90 days)	1.0%	1.0%	-	2.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

Number of days lost through job absence in the year, calculated as: (Number of days lost through job absence in the year) / [(Number of employees on 1st day of the year + Number of employees on the last day of the year) / 2] \* (Number of available workdays in the year).

Are accidents recorded?      Yes

All accidents would be recorded and maintained. No accident occurred in the factory during last months based on record review.

[← Worker interviews](#)

[Code area 0 →](#)

### Annual number of work related accidents and injuries (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of work related accidents and injuries \* 100) / number of total workers.

### Lost day work cases (per 100 workers)\*

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

\* Calculated as (number of lost days due to work accidents and work related injuries \* 100) / number of total workers.

### Percentage of workers that work on average more than 48 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%

[← Worker interviews](#)

[Code area 0 →](#)

### Percentage of workers that work on average more than 48 total hours in a given week

Previous full calendar year (2023)	0.0%	0.0%	-	0.0%
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### Percentage of workers that work on average more than 60 total hours in a given week

	Men	Women	Other	Total
Last full quarter (90 days)	0.0%	0.0%	-	0.0%
Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

# 0. Enabling accurate assessment

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
No findings			
<b>Systems and evidence examined to validate this code section</b>	<p>Current systems:            The factory had established the effective employment policies &amp; program to meet the Code and labour standards required by local law and customers. Ms. Yang XX/ manager was responsible for compliance with the Code implementation and the Code was communicated to all employees through trainings, handbooks and postings at the facility.</p> <p>Details:</p> <ol style="list-style-type: none"> <li>1. Business license</li> <li>2. Employee Handbook</li> <li>3. Factory Manual contains details of Code and labour standards required by local law and customers.</li> <li>4. The written policy including human rights.</li> <li>5. Appointment book of person responsible for implementing standards concerning Human rights</li> <li>6. Factory rules</li> <li>7. Social compliance management handbook</li> <li>8. Training records of the Code, social compliance, human rights</li> <li>9. Employee interview, employees could raise the human rights issues by suggestion box confidentially or call the hotline to the management who was responsible for implementing standards concerning Human rights directly.</li> </ol>		

## 0. Enabling accurate assessment

### Data points

Has the site received an official notice, fine, prosecution, or withhold release order (WRO) for non-compliance with legislation, regulation, consent, or permits within the last three years, relating to Health and Safety, labour rights or the environment? No

Did any workers selected by the auditor decline to be interviewed? No

# 1. Employment is freely chosen

## Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures 'Employment is freely chosen', taken regularly review & update and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable in the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies, regular training was available to ensure the management meet the requirement. The management structure ensures the effectiveness to achieve compliance sustainably over time.

#### 3. Training and communication: Robust

The factory had developed an annual training plan and trains employees according to the plan, and they had evaluated the effectiveness of employee training, and interviewee knew the requirement.

#### 4. Monitoring: Robust

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to validate this code section**

## Current systems:

- The factory had established effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days notification.
- Workers obtained their job by friend's recommendation or by the factory recruitment.
- Workers did not require lodging deposits or their Identity papers to the factory at the beginning of employment.
- The terms and conditions of employment in the handbook state that workers were free to leave the workplace after their working hours.
- No forced, bonded, or involuntary prison labour was identified during the audit.

## Details:

- Factory rules
- Employee handbook
- Personnel files
- Resignation records
- Contracts
- Management and worker interview

1. Employment is freely chosen

## Data points

If required under local law, is there a published 'modern slavery' or similar statement? Not Applicable

Does the site utilise any workers who are prisoners? No

Does the site use the labour of persons required to work under any government scheme? No

# 1.A. Responsible recruitment and entitlement to work

## Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
Factory had established documented policy and procedures on recruitment, take regularly review & update and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: Robust  
There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. The management structure ensures the effectiveness to achieve compliance sustainably over time.
3. Training and communication: Robust  
The factory had developed an annual training plan, trains employees according to the plan and the regular training records were provided for review.
4. Monitoring: Robust  
The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
-----------	-----------------------	------------	---------

No findings

[← Code area 1](#)

[Code area 2 →](#)

**Systems and evidence examined to validate this code section**

Current systems:

1. The factory had established the effective employment policies & program to meet the Code and labour standards required by local law and customers.
2. Ms. Yang XX/ manager was responsible for compliance with the Code implementation and the Code was communicated to all employees through trainings, handbooks and postings at the facility.
3. No labour provider or on-site subcontractor was used.
4. No recruitment fee or cost was charged from workers.

Details:

1. Employees' manual, Factory rules
2. Personnel files records
3. Training records
4. Labor contracts
5. Management and worker interview

## 1.A. Responsible recruitment and entitlement to work

### Data points

#### Labour hire

Does the site use labour providers and/or formal, temporary, seasonal or guest worker programmes?	Workers are recruited, selected, and hired directly by our company
How do the labour providers recruit and hire workers?	N/A - Recruitment providers not used
Where labour providers were used to recruit, what was the highest number of tiers identified in a workers recruitment journey?	0
Are there any subcontracted workers (excluding dispatched labour) on site?	No
Were all non-employee (e.g. agency or subcontracted) workers included within the scope of this audit for the purpose of document review and (if onsite on date of audit) interview?	Not Applicable
Were sufficient documents for non-employee (e.g. agency or other subcontracted) workers available for review?	Not Applicable

#### Migrant workers

Do any workers migrate across international borders to work at this site?	No
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[← Code area 1.A](#)

[Code area 2 →](#)

Percentage of workers that are migrant 0%

Do any workers migrate from other states, provinces or regions within the country to work at this site? No

## Recruitment fees

Were you able to detect recruitment fees and costs paid by workers during the recruitment and employment process? Not Applicable

Were recruitment fees or costs identified during worker interviews? No

No such cost.

## 2. Freedom of association and right to collective bargaining are respected

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
Factory had established documented policy and procedures on freedom of association, take regularly review & update the policy and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: Robust  
There was a responsible person available for ensuring implementation of site policies, regular training was available to ensure the management meet the requirement. The management structure ensures the effectiveness to achieve compliance sustainably over time.
3. Training and communication: Robust  
The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review.
4. Monitoring: Robust  
The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 1.A](#)

[Code area 3 →](#)

**Systems and evidence examined to validate this code section**

## Current systems:

- Based on document review, management, and worker interview, one worker representative was freely elected by workers in the factory, meetings between management and worker representative were conducted regularly. The meeting records were provided for review.
- Worker representative was not discriminated against and had access to carry out its representative functions in the workplace.
- Through workers interview, workers could rise their opinion through worker representative or communicate with their supervisor directly.

## Details:

- The policy on freedom of association
- Interview with workers and management
- Interview with worker representative
- Worker representative electing records

## 2. Freedom of association and right to collective bargaining are respected

### Data points

Are trade unions allowed by law in the national context?	Yes
Are there any registered trade unions in the workplace?	No
Are they active?	
Does the employer recognise the trade union?	Not Applicable
Are the worker representative bodies, trade union or otherwise, accessible to all workers, including more vulnerable workers (such as female, migrant, agency, and seasonal workers)?	Yes
Are the worker representatives freely elected by the workforce as a whole?	Yes
Does union/worker committee membership reflect the gender composition of the workforce?	Yes
Does the membership reflect the nationality composition of the workforce?	Not Applicable
Has there been any industrial action (e.g. strikes, unrest, or cases raised to formal tribunals or labour courts) in the past two years?	No

[← Code area 2](#)

[Code area 3 →](#)

### 3. Working conditions are safe and hygienic

#### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures on health and safety, take regularly review & update the policy and posted on employee notice board. The factory policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies and the responsible person had trained by local authority and obtained the Safety production management certificate, meanwhile, regularly training was required to meet the requirement. It can be very likely that the management structure ensures sustainable compliance.

#### 3. Training and communication: Fundamental Improvements Required

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. But based on site observation and management interview, the factory was not very clear about some EHS requirements, such as the importance of machine guards, for example, the eye shields of some over-locking machines were not correctly used. This is a major finding, so it is considered that fundamental Improvements is still Required.

#### 4. Monitoring: Fundamental Improvements Required

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. However, a major non-compliance on machine safety guards was identified. This is a major finding, so it is considered that fundamental Improvements is still Required.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
3. Working conditions are safe and hygienic	3.M Ensure all machinery is installed, mainta...	Local law Base code	NC <a href="#">ZAF601184957</a>

[← Code area 2](#)

[Code area 4 →](#)

**Systems and evidence examined to validate this code section**

Current systems:

1. General Health and Safety management

- There is a designated staff responsible for site Health & Safety.
- Potable water was available in all areas.
- Enough clean toilets segregated by gender were available for workers.
- Ventilation, temperature, and lighting were suitable for workers.

2. Fire Safety

- There were at least 2 exits for each working area and warehouse.
- Fire-fighting equipment was adequate and checked once per month.
- Evacuation plans were posted at each factory workshop.
- Fire drills were organized and conducted every 6 months in the past year. Recent twice fire drills were conducted on Jul 10, 2025 and Nov 7, 2025.

3. Electrical safety

- Electrical equipment was maintained in good condition.

4. Medical services

- There were adequate first aid kits in each production area, and they were well stocked.
- First aider was available.

Details:

- Health and safety policy and manual
- Health and safety committee
- Fire equipment maintenance records
- Training records
- Building structure safety certificate and fire safety certificate
- Fire drill records
- Accident records
- Interview with factory management and workers

# Findings: non-compliances

ZAF601184957

Non-compliance

Due 2025-12-17

## Code area

3 Working conditions are safe and hygienic

## Status

Open\*

## Workplace requirement

3.M Ensure all machinery is installed, maintained, and used in a safe manner.

## Time given to resolve

30 days

## Issue title

264 - Machines lack appropriate safety guards (e.g. eye or needle guards on sewing machines, belt/hand guards on other machines)

## Verification method

Desktop audit

## Description

It was noted that eye shields were installed for all over-locking machines in sewing section in the factory, but about 30% workers didn't use them during operation.

在此次审核过程中，审核员发现工厂缝纫车间中所有的锁边机都安装了护眼挡板，但约30%的工人在操作中未使用。

## Area of non-compliance/non-conformance

Local law

Base code

## Corrective and preventative actions

It is recommended that the factory should conduct regular Health & Safety inspection, ensure the eye shields for all over-locking machines were correctly used to reduce or eliminate the risk of an injury from moving machinery parts.

## Local law reference

In accordance with General Rules for Designing the Production Facilities (GB5083-2023) article 6.1.1, Safety and health protective devices shall be installed for movable parts of production equipment that could cause personal injury through contact during operation.

## Evidence

[← Code area 3](#)

[Code area 4 →](#)



[NC-eye shield wasn't used.JPG](#)

\* PDF generated at 03:19 (UTC) on 17 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

### 3. Working conditions are safe and hygienic

## Data points

Is someone within the company responsible for health and safety?	Yes, senior manager or business owner
Do workers operate high risk or heavy machinery or vehicles as part of their jobs?	No
Do workers handle or have access to hazardous substances (e.g. chemicals or pesticides)?	No
Who organises accommodation for workers?	Workers independently arrange their own accommodation
Who organises worker transportation between accommodation and worksite?	Workers organise their own transport
Who organises worker transportation while at work?	Workers organise their own transport
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Yes  The factory has obtained valid structural permit and inspection report for their buildings as per local law.
Does the visual appearance of the building give you any immediate concerns about the structural integrity of the building?	No
Are there any cracks observed in the walls, floors, ceilings or other areas of the facility, both internally or externally?	No

[← Code area 3](#)

[Code area 4 →](#)

Does the site have a structural engineer evaluation? Yes

[← Code area 3](#)

[Code area 4 →](#)

## 4. Child labour shall not be used

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures on forbidding child labor, and special protection on young worker, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies, who had good awareness and taken periodic training to ensure meeting the requirement. The management structure ensures the effectiveness to achieve compliance sustainably over time.

#### 3. Training and communication: Robust

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. The policy was published to workers, and the interviewees knew the basic requirement of child labor and special protection on young worker. Due to effective assessment of understanding of those receiving training and/ or communications, factory can ensure a high level of efficacy.

#### 4. Monitoring: Robust

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 3](#)

[Code area 5 →](#)

**Systems and evidence examined to validate this code section**

## Current systems:

- The factory established a policy on worker's recruitment that workers must present their original ID card to proof their ages while recruiting, workers' original copies of ID card would be kept in their personnel file once they have joined. And the policy stated that the factory never employed or used any child labour under the age of 16 years old.
- The factory established policy to protect young workers which stated given a regular health check and would be registered with the local labour office, also did not arrange young workers to hazardous post.
- No child labour or juvenile workers was working at the factory currently.

Remark: In China, minimum age of worker is 16 years old. Workers between 16-18 are young workers.

## Details:

- Policy on worker's recruitment
- Personnel files including the ID card copies of workers
- Roster and labour contracts of all workers
- Worker interview and management interview

#### 4. Child labour shall not be used

## Data points

Percentage of workers that are age 24 or younger	0%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	28
Enter the number of workers under local legal minimum age	0
Enter the number of workers under 15 years old	0
Percentage of workers that are apprentices, trainees or interns	0.0%
Were there children present on the work floor but not working at the time of audit?	No
Do children live at the accommodation provided to workers?	Not Applicable

[← Code area 4](#)

[Code area 5 →](#)

## 5. Legal wages are paid

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
 Factory had established documented policy and procedures on salary and welfare, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
  
2. Resources: Robust  
 There was a responsible person available for ensuring implementation of site policies, regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.
  
3. Training and communication: Fundamental Improvements Required  
 The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. But based on interview with workers and document review, only partial eligible employees were enrolled in social insurance. It showed some workers were still not clear about the importance of contributing toward social insurance schemes, which shows that there are still shortcomings in the training. Since it's a major finding, auditor considered 'Fundamental Improvements' are required to strengthen the management system and enhance its overall effectiveness.
  
4. Monitoring: Fundamental Improvements Required  
 The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. However, a systematic non-compliance on insufficient social insurance was identified, so the auditor considered 'Fundamental Improvements' are required to strengthen the management system and enhance its overall effectiveness.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance...	Local law Base code	NC <a href="#">ZAF601184958</a>

[← Code area 4](#)

[Code area 5.A →](#)

**Systems and evidence examined to validate this code section**

Current systems:

- The local legal minimum wage was RMB 1930 per month before Sep 1, 2025 and RMB 2170 since Sep 1, 2025. The minimum wage paid by the factory for workers was higher than local legal minimum wage.
- All workers were paid by hourly rate.
- All workers' overtime wages were paid 150%, 200% and 300% of the normal wage rate for overtime on weekdays, weekends, and statutory holidays respectively.
- Workers were paid on the 15th of the following month by bank transfer.
- All workers were provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the details of their wages for the pay period concerned each time that they were paid.
- The factory provided social insurance for only partial eligible employees.
- During this assessment, the factory provided recent months' payrolls from Jul 2025 to Sep 2025 for review since the factory just started operation from Jul 1, 2025. A sampling of these provided records for the months of Sep 2025 (most recent month), Aug 2025 (random month) and Jul 2025 (random month) were reviewed.

Details:

- Payroll records
- Attendance records
- Local legal minimum wage documents
- Wages and benefits policy
- Labour contracts for all employees
- Leave records and resignation records
- Payslips of all interviewed workers
- Workers and management interview

# Findings: non-compliances

ZAF601184958

Non-compliance

Due 2026-01-16

## Code area

5 Legal wages are paid

## Status

Open\*

## Workplace requirement

5.B Ensure that workers receive the insurances and benefits (including leave entitlements) they are legally or contractually entitled to.

## Time given to resolve

60 days

## Issue title

423 - Compulsory insurance (e.g. social insurance, accident insurance etc.) not paid - systemic

## Verification method

Follow up audit

## Description

It was noted that among 96 employees in the factory, 54 of them were retired, and the rest 42 employees were eligible to receive social insurance in Nov 2025 according to the law. However, through review of social insurance enrollment list and payment records, only 10 employees were enrolled in five types of social insurance. Factory bought commercial accident insurance for the rest employees, valid until Aug 5, 2026.

## Area of non-compliance/non-conformance

Local law

Base code

在此次审核中，审核员发现，在2025年11月，工厂共有96名员工，其中54名员工已退休，其余42名员工符合社保的参保条件，但查阅社保参保名单和缴费记录发现，只有10名员工参加了五项社会保险。工厂给其余员工购买了商业意外险，有效期至2026年8月5日。

## Corrective and preventative actions

It is recommended that the factory should ensure all eligible employees are entitled with all five types of social insurance schemes and therefore receive all their statutory welfare to comply with the Law. Under situations, some employees might be reluctant to be enrolled and contribute to such social insurance schemes, the factory should host training sessions to help them understand the importance of contributing toward social insurance schemes.

## Local law reference

In accordance with Social Insurance Act of the People's Republic of China, article 2, the state establishes basic pension insurance, basic medical insurance, occupational injury insurance, unemployment insurance, maternity insurance to form the social security system, to protect citizens' right to receive material assistance from the state and society in accordance with the law from old age, illness, work injury, unemployment, childbirth, etc.

Article 4. Employers and employees within the territory of the People's Republic of China should pay social insurance premiums in accordance with the law.

[← Code area 5](#)

[Code area 5.A →](#)

**Evidence**



[NC-insufficient social insurance coverage.JPG](#)



\* PDF generated at 03:19 (UTC) on 17 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

## 5. Legal wages are paid

### Data points

What is the basic wage paid to workers? Wages are based on job skills and experience

Does the site use digital payment methods (i.e. money paid directly into a bank account) to pay workers? Only digital payments

How much as a percentage of their pay does a worker receive as 'payment-in-kind' benefits? None

### Worker remuneration

Which benefits are provided to permanent or full-time workers that are not provided to temporary or part-time workers? Not applicable

### Summary information

Is legal wage/legally recognised CBAs data available for any of these options? Monthly

Is actual wage data available on site for any of these options? Monthly

Maximum legal working hours	Max hours per day	8.0
	Max hours per week	40.0
	Max hours per month	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

<b>Actual required working hours</b>	<b>Required hours per day</b>	8.0
	<b>Required hours per week</b>	40.0
	<b>Required hours per month</b>	Non applicable
<b>Maximum legal overtime hours</b>	<b>Max hours per day</b>	3.0
	<b>Max hours per week</b>	Non applicable
	<b>Max hours per month</b>	36.0
<b>Actual overtime hours</b>	<b>Max hours per day</b>	2.0
	<b>Max hours per week</b>	14.0
	<b>Max hours per month</b>	64.0
<b>Minimum legal wage</b>	<b>Min per hour</b>	12.47
	<b>Min per day</b>	99.77
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	2170.0
<b>Actual minimum wage</b>	<b>Actual per hour</b>	17.24
	<b>Actual per day</b>	137.93
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	3000.0
<b>Minimum legal overtime wage</b>	<b>Min per hour</b>	18.71
	<b>Min per day</b>	Non applicable
	<b>Min per week</b>	Non applicable
	<b>Min per month</b>	Non applicable

[← Code area 5](#)

[Code area 5.A →](#)

<b>Actual minimum overtime wage</b>	<b>Actual per hour</b>	25.86
	<b>Actual per day</b>	Non applicable
	<b>Actual per week</b>	Non applicable
	<b>Actual per month</b>	Non applicable

## Wage analysis

**Number of workers' records checked** 30

**Provide the date and details of the records** 10 samples from Sep 2025 (most current month)  
10 samples from Aug 2025 (random month)  
10 samples from Jul 2025 (random month)

**Are there different legal minimum/legally recognised CBAs wage grades?** No

**For the lowest paid workers, are wages paid for standard/contracted hours (excluding overtime) below or above the legal minimum/legally recognised CBAs?** Above legal minimum

**Indicate the breakdown of workforce per earnings** Based on the payroll records and attendance records provided by the factory, 100% workers' minimum wage paid by the factory were above the local legal requirement of RMB 2170 per month.

**Are there any bonus schemes used?** Yes  
High temperature bonus, etc.

**Were accurate records shown at the first request?** Yes

**Were any inconsistencies found?** No

## 5.A. Living wages are paid

### Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings
<b>Systems and evidence examined to validate this code section</b>	<p>Current Systems:</p> <ol style="list-style-type: none"> <li>1. The facility established wages and benefits policy and procedure, which ensure all employees' minimum wage exceeded the legal requirement.</li> <li>2. The facility has a wage improvement plan for all employees.</li> <li>3. There was an annual review when local wage rates were examined.</li> <li>4. The factory calculated the sum of a family's education costs, transportation costs, food, clothing, water and electricity costs, rent, expenses for emergency preparations and family savings, and calculated the minimum living wage as RMB 2500/month.</li> <li>5. The total salary paid by the factory is at least RMB 4540 / month, which exceeds the living wage calculated by the factory.</li> <li>6. The factory has determined that their chosen living wage benchmark meets six named benchmarks (Fair Wage Network Typical Family Methodology) and the factory was able to evidence how their chosen alternative benchmark meets the ILO's 10 Principles.</li> </ol> <p>Evidence examined</p> <ol style="list-style-type: none"> <li>1. Wages and benefits policy and procedure</li> <li>2. Local and national laws</li> <li>3. Living wage documents</li> <li>4. Overtime premiums records</li> <li>5. Labour contracts for all workers</li> <li>6. Worker interview and management interview</li> </ol>		

## 6. Working hours are not excessive

### Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met	Robust Management Systems
Appoint a manager with sufficient seniority who is responsible for implementing procedures	Robust Management Systems
Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures	Fundamental Improvements Required
Monitor the effectiveness of procedures to meet policy and workplace requirements	Fundamental Improvements Required

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures on Attendance Management, Overtime regulations and etc., take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies, regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.

#### 3. Training and communication: Fundamental Improvements Required

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review. Factory communicated above policy with management staffs (especially HR department and production management staffs) and workers through regular training. There is posted ETI code and relevant policy in factory workshops. Factory also has specific regulations in worker manual for their use. However, based on interview with HR staffs and some supervisors, they were not very clear about the importance of limiting overtime from the angle of workers physical and mental health, which showed that there are still shortcomings in the training. Attendance records showed that all sample workers' monthly overtime exceeded legal requirements in all 3 sample months. Since it's a major finding, auditor considered 'Fundamental Improvements' are required to strengthen the management system and enhance its overall effectiveness.

#### 4. Monitoring: Fundamental Improvements Required

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. However, a major non-compliance on monthly overtime hours was identified, so the auditor considered 'Fundamental Improvements' are required to strengthen the management system and enhance its overall effectiveness.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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[← Code area 5.A](#)

[Code area 7 →](#)

**6. Working hours are not excessive**

6.F Ensure that where overtime is used, it is...

Local law  
Base code

NC [ZAF601184959](#)

**Systems and evidence examined to validate this code section**

Current systems:

- There were written policies established on working hours and which were communicated to workers during recruitment process, while the factory also provided employees manual to workers.
- The working time of workers were recorded by electronic attendance machine.
- Per time records and worker interview, the normal working hour were 8 hours per day and 40 hours per week.
- The factory provided sample workers' attendance records from Jul 2025 to Nov 2025 for review.
- A sampling of these provided records for the months of Sep 2025 (current month), Aug 2025 (random month) and Jul 2025 (random month) were reviewed.
- Based on provided time attendance records in the three sample months, workers' monthly overtime exceeded 36 hours.
- All workers had at least one day off per seven days. The longest continuous working days were 6 days. Workers' weekly working hours didn't exceed 60.
- Through employees' interview, overtime was voluntary.

Details:

- Employee interview
- Management interview
- Attendance records provide
- Factory policy on working hours
- Sample pay slips

# Findings: non-compliances

ZAF601184959

Non-compliance

Due 2026-01-16

## Code area

6 Working hours are not excessive

## Status

Open\*

## Workplace requirement

6.F Ensure that where overtime is used, it is in order to manage changes in demand or in exceptional circumstances and not used to replace regular employment.

## Time given to resolve

60 days

## 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)

## Verification method

Follow up audit

## Description

It was noted that the factory did not guarantee workers' monthly overtime hours in line with legal requirement. The monthly overtime of 10 out of 10 randomly selected workers (from all sections) exceeded 36 hours in Sep 2025 (current month) with the max of 64 hours. The monthly overtime of 10 out of 10 randomly selected workers (from all sections) exceeded 36 hours in Aug 2025 (random month) with the max of 64 hours. The monthly overtime of 10 out of 10 randomly selected workers (from all sections) exceeded 36 hours in Jul 2025 (random month) with the max of 56 hours. Workers' highest daily overtime was 2 hours.

## Area of non-compliance/non-conformance

Local law

Base code

在此次审核中发现，被审核工厂未能保证员工的月加班时间符合法规要求。在2025年9月(当前月)，随机抽取的10名工人中有10名工人（来自所有车间）的月加班时间超过36小时，最高达到64小时。在2025年8月（随机月），随机抽取的10名工人中，有10名工人（来自所有车间）的月加班时间超过36小时，最高达到64小时。在2025年7月（随机月），随机抽取的10名工人中，有10名工人（来自所有车间）的月加班时间超过36小时，最高达到56小时。工人日加班时间最高为2小时。

## Corrective and preventative actions

It is recommended that the factory should arrange reasonable production plan, increase productivity using positive means (such as bonuses) and reduce the overtime hours to ensure it is within 3 hours per day and 36 hours per month.

[← Code area 6](#)

[Code area 7 →](#)

**Local law reference**

In accordance with the People’s Republic of China 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.

**Evidence**

[NC-excessive monthly overtime.JPG](#)



\* PDF generated at 03:19 (UTC) on 17 Nov 2025. [View this finding on the Sedex platform](#) for live updates and closure details.

## 6. Working hours are not excessive

### Data points

Is the sample size the same as in the wages section?	Yes
Normal day overtime premium as a percentage of standard wages	150%
If the site pays an overtime premium of less than 125% and this is allowed under local law, are there other considerations?	N/A. The factory paid 150%, 200% and 300% of normal rate for overtime hours on normal working days, rest days and public holidays respectively.
Excluding overtime, what are the regular working hours per week for workers at this site?	40.0
Including overtime, what is the average number of working hours per week for full-time workers at this site?	54.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	54.0
Maximum number of days worked without a day off in sample	6

[← Code area 6](#)

[Code area 7 →](#)

## 7. No discrimination is practiced

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
Factory had established documented policy and procedures on discrimination, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: Robust  
There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.
3. Training and communication: Robust  
The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review.
4. Monitoring: Robust  
The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
			No findings

**Systems and evidence examined to  
validate this code section**

## Current systems:

- Per management and workers interview, the factory did not discriminate workers due to their birth, gender, age, religion, race, marital status, ethnical beliefs, and political background, etc.; female workers had the same pay and working conditions as male workers; promotion was based on workers' ability and skill; training was based on working requirement.
- There was no evidence of discrimination in employment, promotion, compensation, welfare, dismissal and retirement.
- There was no evidence of sexual harassment.

## Details:

- The hiring and termination procedure
- Leave application records and employee handbook
- Labour contract and termination records
- Training records
- Worker interview and management interview.

7. No discrimination is practiced

## Data points

Percentage of women workers in skilled or technical roles (e.g. where specific qualifications are needed, such as engineer/laboratory analyst)? 30%

Representation of women in managerial roles (ratio of women workers to women managers) 3%

Representation of women in supervisory roles (ratio of women workers to women supervisors) 0%

Three most common nationalities in managerial and supervisory roles All managements and supervisors were Chinese.

## 8. Regular employment is provided

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures on regular employment, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.

#### 3. Training and communication: Robust

The factory had developed an annual training plan, trains employees regularly according to the plan and the training records were provided for review.

#### 4. Monitoring: Robust

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

**Systems and evidence examined to validate this code section**

Current systems:

- All employees were recruited by the factory directly.
- No labour agency was used to hire workers.
- No temporary worker, apprenticeship schemes or home worker was identified during audit.
- All interviewed workers had received a signed labour contract.
- Workers' personal files were provided for review.

Details:

- The hiring and termination procedure
  - Personal files
  - Payroll records were provided for review
  - Labour contracts
-

8. Regular employment is provided

## Data points

Percentage of workers that are permanently or temporarily employed	100.0%
Percentage of workers that have been engaged via irregular, sub-contracted or non-employment models of labour, rather than permanent or temporary contracts of employment	0.0%
Percentage of workers employed as apprentices, trainees or interns	0.0%

## 8.A. Sub-contracting and homeworkers are used responsibly

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

#### 1. Policies and Procedures: Robust

Factory had established documented policy and procedures on sub-contracting and homeworkers, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.

#### 2. Resources: Robust

There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.

#### 3. Training and communication: Robust

The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review.

#### 4. Monitoring: Robust

The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliances. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

**Systems and evidence examined to  
validate this code section**

## Current systems:

The factory has customer policy on sub-contracting, homeworking, and external processing, as well as written policy and procedure in place to control external working.

The factory posted customers' Code of Conduct in the facility. Through site tour, documents review and management & workers interview, no external working was being used currently.

## Details:

1. Factory policy
2. Quality records and management & workers interview
3. Site tour (check production process)

## 8.A. Sub-contracting and homeworkers are used responsibly

### Data points

Are homeworkers employed directly or engaged through an agent? Not applicable

Gender disaggregated data available

#### Number of homeworkers used

	Men	Women	Other	Total
Number of workers	-	-	-	-

What processes are carried out by homemaker?

Are full records of homeworkers available at the site?

Does the supplier buy products or services from suppliers that use homeworkers? No  
The factory didn't allow suppliers to use homemaker and no homemaker was noted as per the suppliers' assessment reports.

#### Sub-contracting

Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity? No  
There was no such concern as per onsite tour, document review and interview.

[← Code area 8.A](#)

[Code area 9 →](#)

Are any sub-contractors used?

No

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[← Code area 8.A](#)

[Code area 9 →](#)

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Audit company:  
**LRQA**

Audit reference:  
**ZAA600167816**

Start Date:  
**2025-11-10**

End Date:  
**2025-11-10**

## 9. No harsh or inhumane treatment is allowed

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
Factory had established documented policy and procedures on harsh or inhumane treatment, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
2. Resources: Robust  
There was a responsible person available for ensuring implementation of site policies, and regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.
3. Training and communication: Robust  
The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review.
4. Monitoring: Robust  
The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 8.A](#)

[Code area 10.A →](#)

**Systems and evidence examined to validate this code section**

## Current systems:

- The factory management had established a disciplinary procedure for workers' misbehaviour which included oral warning, written warning and finally termination and the site, had developed a training program for all workers on the procedure. Worker interview confirmed that workers were aware of the disciplinary procedure.
- The factory had established a policy on Harsh Treatment. Based on workers' interview, there was no such negative evidence happened during past.
- There was an internal process for grievance, which was an anonymous suggestion box, where workers can report any grievances (harassment, bullying, discrimination, etc.). Any received complaint would be handled by management, without any reprisal for the worker in question.

## Details:

- The relevant policy on prevention of harassment and abuse.
- Internal grievance procedure documentation
- Training records
- Worker interview and management interview

9. No harsh or inhumane treatment is allowed

## Data points

Is there a formal process for workers to report concerns, complaints, or problems ('grievance mechanism')?	<p>Yes, there is a formal grievance process</p> <p>The grievance process is available to all workers</p> <p>The grievance process is available to members of the local community</p>
What type of grievance mechanism(s) are available?	Suggestion box had been installed in the workshop and workers could also choose to report any concern to manager if needed.
Number of grievances raised in the last 12 months	0
Number of grievances resolved in the last 12 months	0

## 10.A. Environment 2-Pillar

### Management systems

**Develop and maintain relevant policies and procedures to ensure workplace requirements are met** Robust Management Systems

**Appoint a manager with sufficient seniority who is responsible for implementing procedures** Robust Management Systems

**Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures** Robust Management Systems

**Monitor the effectiveness of procedures to meet policy and workplace requirements** Robust Management Systems

[← Code area 9](#)

## Management systems

### Explanation for management systems grades

1. Policies and Procedures: Robust  
 Factory had established documented policy and procedures on environment protection, take regularly review & update the policy and posted on employee notice board. The factory Policies and procedures were appropriate for the site context and were very likely to lead to sustainable compliance with the Base Code Area now and over time through regular review.
  
2. Resources: Robust  
 There was a responsible person available for ensuring implementation of site policies, had good awareness on environment protection and regular training was available to ensure the management meet the requirement. The management structure is likely to ensure the effectiveness to achieve compliance sustainably over time.
  
3. Training and communication: Robust  
 The factory had developed an annual training plan, trains employees according to the plan and the training records were provided for review.
  
4. Monitoring: Robust  
 The factory continuously monitors the effectiveness of these procedures through regular monitoring and internal audits, and take active actions for the non-compliance. Effective monitoring ensures sufficient management of the Workplace Requirements in this Base Code Area on an ongoing basis.

## Summary of findings

Code area	Workplace requirement	Area of NC	Finding
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No findings

[← Code area 9](#)

**Systems and evidence examined to validate this code section**

Current systems:

- The factory learned about the environment impact of their site and took continuous management measures to control environment impact.
- Based on workers' interview, they were trained on environmental protection.
- The factory had procedure on environment protection.
- All legal required environmental permission and certificates were provided for review.

Details:

1. Worker and management interview
  2. Onsite observation
  3. Document review
- 

[← Code area 9](#)

## 10.A. Environment 2–Pillar

### Data points

Has the site received an official notice, fine or prosecution for any non-compliances with environmental legislation, regulation, consent or permits (within the last three years)?

No

Does the site have any valid environmental or energy management certificates?

Nil

Are there any other sustainability certifications present (e.g. Forest Stewardship Council (FSC), Marine Stewardship Council (MSC)?

No

Has the site implemented or made plans to implement any adaptive measures to protect workers from the impact of climate change?

Yes

The factory has made plans to implement adaptive measures to protect workers from the impact of climate change. High/low temperature assessment was conducted, ventilation and air conditioning facility was available.

[← Code area 10.A](#)

## Attachments



[LRQA-CN-SMTA-332535\\_signed cap\\_Wuhu Tianling Garment Co., Ltd.\\_Nov 10, 2025.pdf](#)



[LRQA-CN-SMTA-332535\\_Photo Form\\_Wuhu Tianling Garment Co., Ltd.\\_Nov 10, 2025.docx](#)