

SMETA

SMETA Corrective Action Plan Report (CAPR)

Version 6.1



杨丽娟 恒腾

Audit Content:

- (1) A SMETA audit was conducted which included some or all of Labour Standards, Health & Safety, Environment and Business Ethics. The SMETA Best Practice Version 6.1 (March 2019) was applied. 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.
- (2) The audit scope was against the following reference documents
- 2-Pillar SMETA Audit**
- ETI Base Code
 - SMETA Additions
 - Universal rights covering UNGP
 - Management systems and code implementation,
 - Responsible Recruitment
 - Entitlement to Work & Immigration,
 - Sub-Contracting and Home working,
- 4-Pillar SMETA**
- 2-Pillar requirements plus
 - Additional Pillar assessment of Environment
 - Additional Pillar assessment of Business Ethics
 - The Customer's Supplier Code (Appendix 1)
- (3) Where appropriate non-compliances were raised against the ETI code / SMETA Additions & local law and recorded as non-compliances on both the audit report, CAPR and on Sedex.
- (4) Any Non-Compliance against customer code shall not be uploaded to Sedex. However, in the CAPR these 'Variances in compliance between ETI code / SMETA Additions/ local law and customer code' shall be noted in the observations section of the CAPR.



Audit company:

Extensive Standard Technical Services Co
Ltd

Report reference:

ZAA600041619

Start Date:

2024-01-04

End Date:

2024-01-05

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Guidance

The Corrective Action Plan Report summarises the site audit findings and a corrective, and preventative action plan that both the auditor and the site manager believe is reasonable to ensure conformity with the ETI Base Code, Local Laws and additional audited requirements. After the initial audit, the form is used to re-record actions taken and to categorise the status of the non-compliances.

N.B. observations and good practice examples should be pointed out at the closing meeting as well as discussing non-compliances and corrective actions.

To ensure that good practice examples are highlighted to the supplier and to give a more 'balanced' audit a section to record these has been provided on the CAPR document (see following pages) which will remain with the supplier. They will be further confirmed on receipt of the audit report.

Root cause (see column 4)

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

See SMETA BPG Chapter 7 'Audit Execution' for more explanation of "root cause".

Next Steps:

1. The site shall request, via Sedex, that the audit body upload the audit report, non-compliances, observations and good examples. If you have not already received instructions on how to do this then please visit the web site www.sedexglobal.com.
2. Sites shall action its non-compliances and document its progress via Sedex.
3. Once the site has effectively progressed through its actions then it shall request via Sedex that the audit body verify its actions. Please visit www.sedexglobal.com web site for information on how to do this.
4. The audit body shall verify corrective actions taken by the site by either a "Desk-Top" review process via Sedex or by Follow-up Audit (see point 5).
5. Some non-compliances that cannot be closed off by "Desk-Top" review may need to be closed off via a "1 Day Follow Up Audit" charged at normal fee rates. If this is the case, then the site will be notified after its submission of documentary evidence relating to that non-compliance. Any follow-up audit must take place within twelve months of the initial audit and the information from the initial audit must be available for sign off of corrective action.
6. For changes to wages and hours to be correctly verified it will normally require a follow up site visit. Auditors will generally require to see a minimum of two months wages and hours records, showing new rates in order to confirm changes (note some clients may ask for a longer period, if in doubt please check with the client).



Audit Details			
Sedex Company Reference: <i>(only available on Sedex System)</i>	ZC1010324	Sedex Site Reference: <i>(only available on Sedex System)</i>	ZS1064758
Business name (Company name):	Kunshan LongXing Culuture and Education Gifts Co Ltd		
Site name:	Kunshan LongXing Culture and Education Gifts CO LTD		
Site address:	No. 95, Longjiang Road, Kunshan Development Zone, Jiangsu Province. 江苏省昆山开发区龙江路 95号 Kunshan city 215300 CN	Country:	CN
Site contact and job title:	Ms. Jiang Lili 蒋丽丽 / Safety Officer 安全员		
Site phone:	051257818980	Site e-mail:	tommy.h.hsu@foxmail.com
SMETA Audit Pillars:	<input checked="" type="checkbox"/> Labour Standards	<input checked="" type="checkbox"/> Health and Safety (plus Environment 2-Pillar)	<input checked="" type="checkbox"/> Environment 4-pillar <input checked="" type="checkbox"/> Business Ethics
Date of Audit:	2024-01-04		

Audit Company Name:
Extensive Standard Technical Services Co Ltd

Audit Conducted By					
Affiliate Audit Company	<input checked="" type="checkbox"/>	Purchaser	<input type="checkbox"/>	Retailer	<input type="checkbox"/>
Brand owner	<input type="checkbox"/>	NGO	<input type="checkbox"/>	Trade Union	<input type="checkbox"/>
Multi-stakeholder	<input type="checkbox"/>	Combined Audit (select all that apply)			



Audit Parameters				
Time in and time out	Day 1		Day 2	
	In	08:07	In	08:00
	Out	17:07	Out	12:00
Audit type:	PERIODIC			
Was the audit announced?	ANNOUNCED			
Was the Sedex SAQ available for review?	Yes			
Any conflicting information SAQ/Pre-Audit Info to Audit findings?	No			
Who signed and agreed CAPR	Ms. Jiang Lili 蒋丽丽 / Safety Officer 安全员			
Is further information available	No			



许恒腾 蒋丽丽

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



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Summary of Findings

Issue <i>(please click on the issue title to go direct to the appropriate audit results by clause)</i>	Area of Non-Conformity		Number of issues			Findings
	ETI	Local Law	NC	Obs	GE	
<u>6 - Working hours are not excessive</u>	6.1	§1	1	0	0	NC - ZAF600293941
<u>3 - Working conditions are safe and hygienic</u>	3.1 3.1 3.1 3.1	§2 §3 §4 §5	4	0	0	NC - ZAF600293942 NC - ZAF600293943 NC - ZAF600293944 NC - ZAF600293945
<u>0B - Management systems and code implementation</u>	0.B.1 0.B.3		2	0	0	NC - ZAF600293946 NC - ZAF600293947

Local Law Issues

Issue	Description
§1	Labor Law of the People's Republic of China, Article 41 The employing unit may extend working hours as necessitated by its production or business operation after consultation with the trade union and laborers, but the extended working hour per day shall generally not exceed one hour; if such extension is needed for special reasons, under the condition that the health of laborers is guaranteed, the extended hours shall not exceed three hours per day. However, the total extension in a month shall not exceed thirty six hours.
§2	Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010) 8.3, In the work site or workshop where chemical burn may occur or acute poisoning may Happen due to skin mucous absorption, onsite emergency treatment facilities shall be installed near work site according to possible or existent occupational hazards and their characteristics. First-aid facilities shall consist of: continuous showering-and-eye-washing facilities; gas resistance cabinet; personal protective device; first aid kit and first-aid medicine; stretcher and device for transporting patient; first-aid treatment facilities as well as emergency-rescue communication equipment. In workplaces or workshops where chemical burns or acute poisoning resulting from mucous absorption may occur, emergency response facilities should be established nearby based on the potential or existing occupational hazardous factors and characteristics. Emergency response facilities should include shower and eye wash devices with continuous water supply, gas protection cabinet, personal protective equipment, first-aid kit and medicine, stretcher and devices for transfer of patients, first aid equipment and communications equipment for emergency rescue. 8.3.3 First-aid kit shall be laid in the place where it is convenient for worker's usage and the allocation may be determined according to actual demand and Table A.4 in Annex A. Besides, the allocation shall be checked and renewed regularly by specially-assigned persons.
§3	Regulations on the Control over Safety of Dangerous Chemicals, Article 20 The units producing, storing dangerous chemicals shall, according to the categories and hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipment for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, firefighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moisture-proof, protection against thunder, protection against static, antiseptis, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipment.

Audit company:

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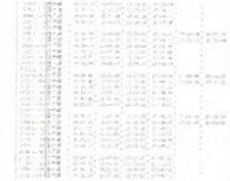

S4	Law of the People's Republic of China on Work Safety (effective since September 1, 2021), Article 45 Production and business units shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use.
S5	Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, Article 2-7 The electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen. 6.2 The material of signs: Safety signs should be made of durable material. The materials which will be deformed or deteriorated when wet and flammable material are generally shall preferably not be used. The insulation material should be used at workplace where there is risk of electric shock.



Corrective Action Plan - Non Compliances



許恒路 蔡明

Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293941	
Clause	6 - Working hours are not excessive	
Issue Title	480 - Overtime is not used responsibly i.e. extent, frequency and level of hours worked by individual workers and / or whole workforce are excessive	
Subcategory	Overtime	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input checked="" type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Labor Law of the People's Republic of China, Article 41 The employing unit may extend working hours as necessitated by its production or business operation after consultation with the trade union and laborers, but the extended working hour per day shall generally not exceed one hour; if such extension is needed for special reasons, under the condition that the health of laborers is guaranteed, the extended hours shall not exceed three hours per day. However, the total extension in a month shall not exceed thirty six hours.	
ETI code	6.1 - Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.	
Explanation to the non compliance	The factory provided attendance records from December 2022 to the day of the audit. A sample of 10 workers in each of November 2023 (current month), July 2023 (random month), and April 2023 (random month) worked more than the legally required 36 hours of overtime per month. The details are as follows: 10/10 workers worked 50 hours of overtime in November 2023, 10/10 workers worked 52 hours of overtime in July 2023, and 10/10 workers worked 46 hours of overtime in April 2023. 工厂提供了 2022 年 12 月至审核当天的考勤记录。在 2023 年 11 月（当月）、2023 年 7 月（随机月份）和 2023 年 4 月（随机月份）各抽样 10 名工人，这些工人每月的加班时间超过了法律规定的 36 小时。具体情况如下：10/10 名工人在 2023 年 11 月加班 50 小时，10/10 名工人在 2023 年 7 月加班 52 小时，10/10 名工人在 2023 年 4 月加班 46 小时。	
		 NC-monthly_OT exceeded 36 hours.png
		 許恒鵬 符啟明

Follow up method	<input checked="" type="checkbox"/> Follow up audit <input type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that factories ensure that all employees' monthly overtime hours meet regulatory requirements. 建议工厂确保所有工人的月加班符合法规要求。	



Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600293942	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	289 - First aid box available but contents are missing / contents out of date or otherwise inadequate	
Subcategory	First Aid / Accidents	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Resolved by audit	ZAA600041619	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Hygienic standards for the Design of Industrial Enterprises (GBZ 1-2010) 8.3, In the work site or workshop where chemical burn may occur or acute poisoning may Happen due to skin mucous absorption, onsite emergency treatment facilities shall be installed near work site according to possible or existent occupational hazards and their characteristics. First-aid facilities shall consist of: continuous showering-and-eye-washing facilities; gas resistance cabinet; personal protective device; first aid kit and first-aid medicine; stretcher and device for transporting patient; first-aid treatment facilities as well as emergency-rescue communication equipment. In workplaces or workshops where chemical burns or acute poisoning resulting from mucous absorption may occur, emergency response facilities should be established nearby based on the potential or existing occupational hazardous factors and characteristics. Emergency response facilities should include shower and eye wash devices with continuous water supply, gas protection cabinet, personal protective equipment, first-aid kit and medicine, stretcher and devices for transfer of patients, first aid equipment and communications equipment for emergency rescue. 8.3.3 First-aid kit shall be laid in the place where it is convenient for worker's usage and the allocation may be determined according to actual demand and Table A.4 in Annex A. Besides, the allocation shall be checked and renewed regularly by specially-assigned persons.	
ETI code	3.1 - A safe and hygienic working environment shall	




First aid kit.jpg



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	be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation, it was noted that the first aid kit at 1F package workshop: 1. Insufficient first aid supplies were available in the first aid boxes. 2. Two bottles of hydrogen peroxide solutions were empty. The valid date of one bottle of hemostyptic & antiphlogistic drug (Yunan Baiyao) was expired on December 2018. 根据现场观察，注意到 1F 包装车间的急救箱：1. 急救箱中的急救用品不足。2. 两瓶双氧水溶液是空的。1瓶止血消炎药（云南白药）有效期已于 2018年12月过期。	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	The factory should ensure first aid supplies were provided sufficiently in the first aid boxes. The factory should check and renew the supplies regularly by specially-assigned persons. 工厂应确保在急救箱中提供足够的急救用品。工厂应指派专人定期检查和更新急救用品。	
Additional comments	We had reviewed all aid boxes and replaced the past valid drugs. We also assign someone to checked the box monthly to ensure these are sufficient. During the periodic audit conducted on January 4-5,2024, it was noted that the finding was closed.	




Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	OPEN	
Reference	ZAF600293943	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	240 - No / inadequate safety measures / anti-explosion measures for chemicals (e.g. no anti-leaking system / secondary container / unbunded)	
Subcategory	Chemicals	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Regulations on the Control over Safety of Dangerous Chemicals, Article 20 The units producing, storing dangerous chemicals shall, according to the categories and hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipment for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, firefighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moisture-proof, protection against thunder, protection against static, antiseptis, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipment.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation, it was noticed that no secondary containers were available for 20% of chemicals (Curing agent or glue) in the chemical warehouse. 根据现场观察,发现化学品仓库中 20% 的化学品(固化剂或胶水)没有二次容器。	
		 <u>NC-Chemical missing secondary container.jpg</u>



Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that factory ensure that secondary containers are available for the appropriate chemicals. 建议工厂确保相应的化学品有二次容器。	



Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600293944	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	278 - Personal Protective Equipment (PPE) provided but incidents of workers not using PPE where appropriate	
Subcategory	Personal Protective Equipment/Clothing	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Resolved by audit	ZAA600041619	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Law of the People's Republic of China on Work Safety (effective since September 1, 2021), Article 45 Production and business units shall provide their employees with work protection gears that are up to national standards or industrial specifications, and they shall give instruction to their employees and see to it that they wear or use these gears in accordance with the rules for their use.	 PPE wearing.jpg
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation and workers interview, it was noted that there were flying chips when cutting or drilling the wooden board at the 1F workshop, but 2 workers did not wear protective glasses during operation though protective glasses were available for them. 根据现场观察和工人访谈, 发现 1F 车间在切割或钻孔木板时有碎屑飞溅, 但有 2 名工人在操作过程中没有佩戴防护眼镜, 尽管工厂为他们提供了防护眼镜。	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
	<input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>	



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Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should supervise and educate employees to wear personal protective equipment properly where applicable. 建议工厂监督和教育工人在需要时佩戴合适的劳保用品。	
Additional comments	We had educated workers to wear the protective equipment and make the rules to warning worker who did not obey the rule. During the periodic audit conducted on January 4-5,2024, it was noted that the finding was closed.	



Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600293945	
Clause	3 - Working conditions are safe and hygienic	
Issue Title	227 - Unmarked / incorrect labels / signage / instructions for electrics	
Subcategory	Electrical risk	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Resolved by audit	ZAA600041619	
Root cause	<input checked="" type="checkbox"/> Training <input type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
Local law issue	Warning Sign in the Guidelines for Safety Signs and Usage GB 2894-2008, Article 2-7 The electric shock warning sign should be marked on electricity devices and circuit where electric shock may happen. 6.2 The material of signs: Safety signs should be made of durable material. The materials which will be deformed or deteriorated when wet and flammable material are generally shall preferably not be used. The insulation material should be used at workplace where there is risk of electric shock.	
ETI code	3.1 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.	
Explanation to the non compliance	Based on site observation, it was noted that 2 electric boxes at the 1F workshop were without warning sign. 根据现场观察, 发现 1F 车间的 2 个电箱没有警示标志。	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input checked="" type="checkbox"/> 30 days <input type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
	 Warning sign posted.jpg	

Audit company:

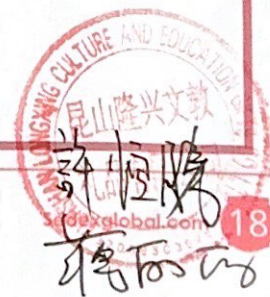
Extensive Standard Technical Services Co Ltd

Report reference:

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Start Date: End Date:

2024-01-04 2024-01-05



Actions	It is recommended that the factory ensure that all electrical equipment should be labeled with warning signs. 建议工厂确保所有的电器设备张贴警示标识。
Additional comments	Completed all the post warning sign on the electric boxes. During the periodic audit conducted on January 4-5, 2024, it was noted that the finding was closed.

Non-Compliance	Evidence
[Back to findings summary]	
Non-Compliance	
Status	OPEN
Reference	ZAF600293946
Clause	0B - Management systems and code implementation
Issue Title	687 - The ethical Code (i.e. ETI Base Code for SMETA audits) is not communicated to the site's employees
Subcategory	Site's Awareness of Code/Legal Requirements
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over
Raised by audit	ZAA414498249
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other
Root cause - Other	
ETI code	0.B.3 - Suppliers are expected to communicate this Code to all employees.
Explanation to the non compliance	The factory did not communicate the ETI Base Code to all employees effectively. Based on workers interview, 4 out of 10 sampled interviewed workers didn't know the ETI Base Code well. 工厂没有将ETI要求有效地传达给所有员工。通过员工访谈, 10个被访谈的员工中有4名不清楚ETI要求。
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other
Actions	It is recommended that the factory should communicate the ETI Base Code to all employees effectively. 建议工厂将ETI要求有效传达给全体员工。



Signature: 許恒勝



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Non-Compliance		Evidence
[Back to findings summary]		
Non-Compliance		
Status	CLOSED	
Reference	ZAF600293947	
Clause	0B - Management systems and code implementation	
Issue Title	8 - No / inadequate management systems in place (e.g. not appropriate for site context, not effective in ensuring compliance)	
Subcategory	Site's Management systems & Monitoring	
New or carried over?	<input type="checkbox"/> New <input checked="" type="checkbox"/> Carried Over	
Raised by audit	ZAA414498249	
Resolved by audit	ZAA600041619	
Root cause	<input checked="" type="checkbox"/> Training <input checked="" type="checkbox"/> System <input type="checkbox"/> Costs <input type="checkbox"/> Lack of workers <input type="checkbox"/> Other	
Root cause - Other		
ETI code	0.B.1 - Suppliers are expected to implement and maintain systems for delivering compliance to this Code.	
Explanation to the non compliance	Based on site observation, document review, workers, and management interview, it was noted that the factory did not take proper actions to correct the non-compliances in last audit. There were 3 non-compliances in last audit report, 2 of them were corrected, but the factory still not fully corrected the last one finding in this audit.	
Follow up method	<input type="checkbox"/> Follow up audit <input checked="" type="checkbox"/> Desktop audit	
Timescale	<input type="checkbox"/> Immediate <input type="checkbox"/> 30 days <input checked="" type="checkbox"/> 60 days <input type="checkbox"/> 90 days <input type="checkbox"/> 120 days <input type="checkbox"/> 180 days <input type="checkbox"/> 365 days <input type="checkbox"/> Other	
Actions	It is recommended that the factory should take actions to correct and close all non-compliances.	
Additional comments	During the periodic audit conducted on January 4-5,2024, it was noted that the finding was not closed and remained open. During the periodic audit conducted on January 4-5,2024, it was noted that the finding was not applicable.	

Audit company:

Extensive Standard Technical Services Co Ltd

Report reference:

ZAA600041619

Start Date: End Date:

2024-01-04 2024-01-05





Sedex Audit Reference:
ZAA600041619

SMETA Corrective Action Plan Report (CAPR)
Version 6.1



Audit company:

Extensive Standard Technical Services Co
Ltd

Report reference:

ZAA600041619

Start Date:

2024-01-04

End Date:

2024-01-05

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SMETA Declaration

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

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

Auditor Team			
Lead Auditor:	Aria Liu <i>Aria Liu</i>	APSCA Number:	21705035
Additional Auditors:			
Date of declaration:	2024-01-05		

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

Site Representation	
Full Name:	Ms. Jiang Lili 蒋丽丽
Title:	Safety Officer 安全员
Date of declaration:	2024-01-05
Comments:	<p>Any exceptions to this must be recorded here (e.g. different sample size): Sampled wage records from the past 5 months were provided for review (5 months only since the operation for digital thermometer just started last Sep 2020). The audit took 2.0 man-days (9AM-6PM per day). Audit time was extended until 8PM due to the extent of documentation; this was agreed upon with the factory representatives</p>
	Nil



Audit company: Extensive Standard Technical Services Co Ltd
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Signature
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Guidance on Root Cause

Explanation of the Root Cause Column

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

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

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

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

Some examples of finding a "root cause"

Example 1

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

Example 2

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

Example 3

A site uses fines to control unacceptable behaviour of workers.

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

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

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

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

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

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Your feedback on your experience of the SMETA audit you have observed is extremely valuable. It will help to make improvements to future versions.

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[Click here for Auditors:](#)

<https://www.surveymonkey.co.uk/r/BRTVCKP>

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