

Sedex Members Ethical Trade Audit Report

Version 7





Contents

Audit content

Audit and site detail
Audit parameters
Audit attendance

Summary of findings

SMETA declaration

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



3

- 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
- 10.B. Environment 4-Pillar
- 10.C. Business ethics

Attachments



Audit content

(1) A SMETA audit was conducted which included some or all of Labour Standards, Health & 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 following Code Areas:

Included in a 2-Pillar audit:

- 1. Labour Standards Code Areas:
 - 0: Enabling accurate Assessment
 - 1: Employment is Freely Chosen
 - 1.A: Responsible Recruitment & 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
- 2. Health & Safety Code Area:
 - 3: Working Conditions are Safe and Hygienic
- 3. Environment Code Area:
 - 10.A: Environment 2-Pillar

Included in a 4-Pillar audit:

- 1. Labour Standards Code Areas
 - As 2-pillar
- 2. Health & Safety Code Area
 - As 2-pillar
- 3. Environment Code Area:
 - 10.A: Environment 2-Pillar
 - 10.B: Environment 4-Pillar
- 4. Business Ethics Code Area:
 - 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 and site details

Audit details

Sedex company reference	ZC5000028562	Auditor company name	SGS_China
Date of audit	2025-04-27	Audit conducted by	Sedex member
Audit pillars	Labour Standards Health and	l safety Environment 4-Pillar B	usiness ethics
Site details			
Sedex site reference	ZS1000033165	Site name	Suzhou Fushilai Pharmaceutical Co Ltd
Business name	Suzhou Fushilai Pharmaceutical Co Ltd	Site address	215500 No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China中国江苏省常熟新材料产业 园海旺路16号, 常熟市, CN
Site phone	86-13810406181	Site email	qlz@fushilai.com.cn



Audit parameters

Time in and out	Day 1		Day 2	
	In	08:30	In	09:00
	Out	16:30	Out	13:00
Audit type	Periodic			
Was the audit announced?	Announced			
Was the Sedex SAQ available for review?	Yes			
Who signed and agreed CAPR?	Tang Yuxiang	/ Assistant to	o the General N	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	Yes
B: Present at the audit?	Yes	Yes	Yes
C: Present at the closing meeting?	Yes	Yes	Yes
Reason for absence at the opening meeting			
Reason for absence during the audit			

Reason for absence at the closing meeting



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)

Due to the explosion-proof requirements of the factory, only explosion-proof mobile phones provided by the factory can be used for taking photos on site.工厂由于防爆要求,现场仅可以使用工厂提供的防爆手机拍照。

Lead auditor	Kaze Jin	APSCA Number	32200887
Additional auditor	Annie Cao	APSCA Number	32400193
Date of declaration	2025-04-28		

Audit company:Audit reference:Start Date:End Date:SGS_ChinaZAA6001285592025-04-272025-04-28



Site representation

Declaration	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.
Full name	Tang Yuxiang
Title	Assistant to the General Manager
Date of declaration	2025-04-28



Summary of findings

Code area	Workplace requirement	Local law	Finding
6. Working hours are not excessive	6.F Ensure that where overtime is used, it is	§1	NC ZAF600899360
10.A. Environment 2-Pillar	10.A.C Have a system in place for identifying		GE ZAF600915974
3. Working conditions are safe and hygienic	3.F Have a system in place to measure the eff		GE ZAF600915975
5. Legal wages are paid	5.B Ensure that workers receive the insurance		GE ZAF600915976



12

Local law issues

§1

Regulations on the Approval of Variable Hours of Work and Consolidated Hours of Work in Enterprises (1994), Article 5

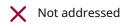
To employees meeting one of the following conditions, enterprises may apply the system of consolidated hours of work; namely, their hours of work are calculated in clusters of hours worked during a week, a month, a season or a year. However, their average day and averageweek hours of work should be basically the same as those adopting the normal system of hours of work:

- 1. Employees in the transport, railway, post and telecommunications, maritime, aviation, and fishing industries may be required by the nature of their job to work continuous hours;
 2. Employees in such industries as geological and resource exploration, construction, salt manufacturing, sugar production and tourism whose work is regulated by seasonal and natural conditions more than anything else;
 3. Other employees who are more suited to the system of consolidated hours of work.



Management systems

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



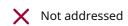
Fundamental improvements required

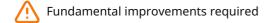
Some improvements recommended

Robust management systems



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





Some improvements recommended

Robust management systems



Site details

Company and site details

Sedex company referenceZC5000028562Sedex site referenceZ51000033165Company nameSuzhou Fushilai Pharmaceutical Co LtdBusiness ownership typeGOODSSite nameSuzhou Fushilai Pharmaceutical Co LtdSite name in local language苏州富士莱医药股份有限公司GPS locationGPS addressNo.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jlangsu, China Latitude: 31°48'12"N Longitude: 120°47'48"EIs the worksite in a remote location, far from habitation?NoSite contactContact name Phone numberTang Yuxiang Assistant to the General Manager BenallPhone number86-13810406181Emailqlz@fushilai.com.cnApplicable business and other legally required business license numbers and documentsBusiness License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the ISO14001 2010 Encrypt Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the ISO14001 2010 Encrypt Management System certificate, with the number 07623E034BRMh/5/001, valid until 2026-7-3.			
Company name Suzhou Fushilai Pharmaceutical Co Ltd Business ownership type GOODS Site name Suzhou Fushilai Pharmaceutical Co Ltd Site name in local language 苏州富士莱医药股份有限公司 GPS address No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China Coordinates Latitude: 31°48′12″N Longitude: 120°47′48″E Is the worksite in a remote location, far from habitation? Site contact Contact name Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the ISO50010 100 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the ISO50010 100 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the ISO50010 100 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the Odo4001 2015 Environmental Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the Odo40001 2018 Environmental Health Management System certificate, with the number 00202EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the Odo40001 2018 Environmental Health Management System certificate, with the number 00202EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained the Odo40001 2018 Environmental Management System certificate, with the number 00202EN0673R0M, and the validity period is until December 2, 2025.	Sedex company reference	ZC5000028562	
Site name Suzhou Fushilai Pharmaceutical Co Ltd	Sedex site reference	ZS1000033165	
Site name in local language 苏州富士莱医药股份有限公司 GPS location GPS address No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China Coordinates Latitude: 31°48′12″N Longitude: 120°47′48″E Is the worksite in a remote location, far from habitation? Site contact Contact name Tang Yuxiang Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400, Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4MI—IS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO4501018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO4501018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025.	Company name	Suzhou Fushilai Pharmaceutical Co Ltd	
Site name in local language 苏州富士莱医药股份有限公司 GPS location GPS address No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China Coordinates Latitude: 31°48′12″N Longitude: 120°47′48″E Is the worksite in a remote location, far from habitation? No Site contact Contact ame Tang Yuxiang Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4Mi-JS001, valid until 2026-318. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained Stool 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained Stool 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained Stool 2010 Energy Management System Certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained Stool 2018 Occupational Health Management System	Business ownership type	GOODS	
GPS location GPS address No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China Coordinates Latitude: 31°48′12″N Longitude: 120°47′48″E Is the worksite in a remote location, far from habitation? No Site contact Contact name Job title Assistant to the General Manager Phone number 86-13810406181 Email Rugefushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO5001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained S045001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained S045001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025.	Site name	Suzhou Fushilai Pharmaceutical Co Ltd	
Is the worksite in a remote location, far from habitation? No Contact name Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, unmber 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 070222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025.	Site name in local language	苏州富士莱医药股份有限公司	
Is the worksite in a remote location, far from habitation? No Site contact Contact name Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-J5/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System	GPS location	GPS address	No.16, Haiwang Rd, Advanced Material Industrial Park, Changshu, Jiangsu, China
Site contact Contact name Job title Phone number Email Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System		Coordinates	
Job title Assistant to the General Manager Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System	Is the worksite in a remote location, far from habitation?	No	
Phone number 86-13810406181 Email qlz@fushilai.com.cn Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System	Site contact	Contact name	Tang Yuxiang
Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System		Job title	Assistant to the General Manager
Applicable business and other legally required business license numbers and documents Business License No.: 913205007205525400. Valid from Nov 27, 2000 to long term The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System		Phone number	86-13810406181
réquired business license numbers and documents The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025. The factory has obtained ISO45001 2018 Occupational Health Management System		Email	qlz@fushilai.com.cn
	required business license numbers and	The factory has obtained the ISO14001 20 certificate, number 07623E0340R4M-JS/00 The factory has obtained the ISO50001 20 with the number 00222EN0673R0M, and the factory has obtained ISO45001 2018 C	15 Environmental Management System 1, valid until 2026-3-18. 10 Energy Management System certificate, he validity period is until December 2, 2025. Occupational Health Management System

Site activities

Site function Factory Processing/Manufacturer



Site activities

Site activities	Primary	Manufacture of pharmaceuticals, medicinal chemical and botanical products	
	Secondary		
	Other		
Product type	Alpha lipoic acid, L-carnosine, Phosphatidylcholine.		
Process overview	Main products: Alpha lipoic acid, L-carnosine, Phosphatidylcholine. Main production processes: Raw materials ->acylation ->Addition wash reaction ->Calving - >Reduction reaction ->Reduction wash reaction ->Chlorination reaction ->Chlorination wash reaction >Package ->Finished products. 5 production lines were available in the factory. Main equipment: Reactors, Crystallization machines, Drying machines etc.		
What level of mechanization best describes the work at this site?	High mechanisation / low manual Labour		

Site scope

Is the audited site a physically continuous area?	Yes	
What is the area of audited site to its boundary?	80000m²	
Building 1	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	4
	Description of floor activities	Floor 1 Office Floor 2 Office and canteen Floor 3 Office Floor 4~5 Testing center
Building 2	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	5
	Description of floor activities	Floor 1~5 R&D cernter



Site scope

Building 3	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	Floor 1~2 Workshop
Building 4	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	Floor 1~3 Workshop
Building 5	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	Floor 1~3 Workshop
Building 6	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	Floor 1~3 Workshop
Building 7	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	Floor 1 Hazardous waste warehouse Floor 2 Storage of environmental protection facilities
Building 8	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	3
	Description of floor activities	Floor 1~3 Workshop



Site scope

Building 9	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	2
	Description of floor activities	Floor 1~2 Raw material warehouse and finished goods warehouse
Building 10	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	Floor 1 Hazardous chemical warehouse
Building 11	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	Floor 1 Hazardous chemical warehouse
Building 12	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	Floor 1 Hazardous chemical warehouse
Building 13	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	Floor 1 Hazardous chemical warehouse
Building 14	Last construction works on site	2013
	If building is shared, provide details	NA
	Number of floors	1
	Description of floor activities	Floor 1 Maintenance room
Is there any difference between the site scope of the audit and the Sedex site profile?	No	



Site scope

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?

Site provided

The factory provides free shuttle buses for its employees, and they can choose for themselves whether to use them or not $\frac{1}{2} \int_{\mathbb{R}^{n}} \frac{1}{2} \left(\frac{1}{2} \int_{\mathbb{R}^{n}} \frac{1}{2} \left(\frac{1$

Work patterns

Approximate workers on site per month (% of peak)	January	95-100%	February	25-50%	
(% of peak)	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?	Yes Production line workers (2 shifts): 8:00-20:00/20:00-8:00(2 hours for meal and rest in				
	day shift and 1 hour for meal and rest in night shift).				
What percentage of the workforce, including temporary and agency workers, work during the night shift?	50%				
Was the audit conducted across all shift times, and did it include a representative sample of workers from each shift time in interviews and sampling?	Yes The review is only conducted during the day, but the review sample covers all positions that require shift work. The sampling number of workers in positions				

positions that require shift work. The sampling number of workers in positions involving night shifts is: 8



20

Site assessments

Does this site hold any certifications that address labour standards, human rights, corruption or environmental impact?	ISO 45001 (OHS), ISO 50001 (Energy management), ISO 14001 (Environmental management)
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?	No The factory did not conduct assess for negative impacts on the human rights, lands, resources, territories, livelihoods or food security of indigenous peoples or the local community.
Has there been a Human Rights Impact Assessment (HRIA) conducted within the last three years at this site?	No There was no Human Rights Impact Assessment (HRIA) conducted within the last three years at this site.



Worker analysis

Gender disaggregated data available

Men and women

Worker totals

	Men	Women	Other	Total
Number of workers	280 (70%)	120 (30%)		400 (100%)

Workers by type

	Men	Women	Other	Total
Permanent workers (employees)	274 (70.4%)	115 (29.6%)		389 (97.3%)
Temporary or fixed term employees	0 -	0 -		0 (0%)
Agency or subcontracted workers	6 (54.5%)	5 (45.5%)		11 (2.8%)
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



Migrant workers

	Men	Women	Other	Total
Domestic migrant workers	24 (82.8%)	5 (17.2%)		29 (7.2%)
International migrant workers	0 -	0 -		0 (0%)
Total migrant workers	24 (82.8%)	5 (17.2%)		29 (7.2%)

^{* %} of total workforce

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

Anhui,Henan

Workers by age

	Men	Women	Other	Total
18 - 24 years old	8 (88.9%)	1 (11.1%)		9 (2.3%)
15 - 17 years old	0 -	0 -		0 (0%)
Under 15 years old	0 -	0 -		0 (0%)

^{* %} of total workforce



Is the worker analysis data relevant for peak season and current to the audit?

Describe how this may vary during peak periods

There was no observed peak season in the factory.

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

Most common nationalities as approximate % of workforce

	Men	Women	Other	Total
Chinese	70%	30%	-	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	280 (70%)	120 (30%)		400 (100%)
Salaried workers	0 -	0 -		0 (0%)

^{* %} of total workforce

Workers by payment cycle

	Men	Women	Other	Total
Paid daily	0 -	0 -		0 (0%)
Paid weekly	0 -	0 -		0 (0%)
Paid monthly	280 (70%)	120 (30%)		400 (100%)
Other	0 -	0 -		0 (0%)

^{* %} of total workforce

If other payment cycle entered, please provide details

NA



People in managerial, supervisorial and administrative roles

	Men	Women	Other	Total
Employees in management positions	32 (86.5%)	5 (13.5%)		37
Supervisors or team leaders	20 (71.4%)	8 (28.6%)		28
Administrative staff	33 (66%)	17 (34%)		50



Worker interview summary

Gender disaggregated data available Men and women

Which methods of worker engagement

Individual interviews were used? 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	4 group of 5 workers, tot	tal 20		
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) There was no negative evidence found during the audit.
What did the workers like the most about working at this site?	Equal opportunities Transport Freedom of movement Pay
Additional comments	All workers showed a cooperative attitude during the interview process. The worker's interview was conducted independently without the influence of the management. All workers expressed their positive attitude to management and workplace. They agreed with the rules and management of the factory and said that they were satisfied with working condition, payments, and benefits.
Attitude of workers' committee/union representatives	Interviewed with the worker representative, she said factory management were very care about workers and pay more attention to deal with workers' suggestion or complain. The worker representative showed that the management was kind and the workplace was comfortable. No negative information was identified.
Attitude of managers	The factory management had a system in place to check their current practices against their clients'requirements and the local law, and they had implemented a Environmental, Health, Safety and Fire Protection Committee to take care of these concerns. The factory agreed that the auditor accesses to all facilities, and all requested documents and records were provided in a timely manner. The factory agreed that the auditor conducted confidential interviews with employees who were chosen freely without any influence by the factory.

Workers interviewed by type

	Total
Permanent workers	25
Temporary or fixed-term employees	0
Agency or subcontracted workers	1
Seasonal workers	0
Other workers	0
Total number of workers interviewed	26



Workers interviewed by group/individual

	Men	Women	Other	Total
Workers interviewed in groups	12	8	-	20
Workers interviewed individually	3	3	-	6

Migrant workers interviewed

	Men	Women	Other	Total
Domestic migrant workers interviewed	2	0	-	2
International migrant workers interviewed	0	0	-	0
Total migrant workers interviewed	2	0	-	2



Measuring workplace impact

Gender disaggregated data available

Men and women

Annual worker turnover (%)*

	Men	Women	Other	Total
Last full quarter (90 days)	2.0%	3.0%	-	5.0%
Last full calendar year (2024)	3.0%	3.0%	-	6.0%
Previous full calendar year (2023)	3.0%	3.0%	-	6.0%

^{*} 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)	1.0%	0.0%	-	1.0%
Previous full calendar year (2023)	1.0%	1.0%	-	2.0%

^{*} Number of days lost through job absence in the year, calculated as (the number of employees on 1st day of the year + number employees on the last day of the year) / 2)* number available workdays in the year*100

Are accidents recorded?

Yes

Management kept a record of any accidents. No accidents happened in last 12 months.

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

M	1en	Women	Total



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

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%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%

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%



Percentage of workers that work on average more than 60 total hours in a given week

Last full calendar year (2024)	0.0%	0.0%	-	0.0%
Previous full calendar year (2023)	0.0%	0.0%	-	0.0%



32

0. Enabling accurate assessment

Summary of findings

Code area	Workplace requirement	Local law	Finding	
No findings				

Systems and evidence examined to validate this code section

Current systems:

•The factory had established the human rights policy statement which was approved at the most senior level and provided the training to all related workers to make sure the policy effectively, that was also confirmed via interview with workers and

management staffs.

•The factory agreed that the auditor accesses to all facilities, and all requested documents and records were provided in a timely manner.

•There is a written policy on the need to avoid bribes and fraudulent practices. And the suditor conducted the audit without any influence by the factory. auditor conducted the audit without any influence by the factory.

Evidence examined: Management interview

Worker interview

Human rights policy statement

•Training records
•Business ethics policy
•Factory introduction and SAQ



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



34

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

Some Improvements Recommended

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The factory's Recruitment and Employment Policy and procedures prohibiting discrimination, abuse, forced labor, in place to manage this issue at the site includes all relevant requirements of the code area, and further detail can be found in the 'Recruitment and Onboarding' procedure. Employees are free to choose whether to work overtime or not, employees can easily apply for leave and no cases of forced labor have been found.

2) Resource

Grade: Some Improvements Recommended

Resources: Human resources are dedicated to conducting fair and thorough recruitment processes, with trained staff handling interviews and evaluations. A senior director is responsible to ensure compliance on this module. But this role was also taking responsibility for other management, not a dedicated role.

3) Communication & Training:

Grade: Robust

Communication & Training: All employees involved in the recruitment process receive regular training on unbiased hiring practices. They are educated on how to avoid unconscious biases during interviews and evaluations. Internal communication within the recruitment team is also enhanced to ensure everyone is aligned with the principles of free choice in employment. All employees have done a series of relevant training and verified the effectiveness of the training.

4) Monitoring: Grade: Robust

Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively.

Summary of findings

Code area Workplace requirement Local law Finding



35

No findings

Systems and evidence examined to validate this code section

- Current systems:
 The factory had established the effective employment policies & program. Employees could be freely resignation after communication with management in advance 30 days
- The 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 the workers are free to leave the workplace outside of their working hours.

 No forced, bonded or involuntary prison labour was identified during the audit.
- Evidence examined:
 Factory rules
 Employee handbook
 Personnel files

- · Resignation records
- Labour contractsManagement 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

Some Improvements Recommended

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The plant's "Recruitment and Employment Policy" outlines the system for managing this issue on-site, including all relevant requirements for code areas. Employees can freely choose their careers without any recruitment fees. And more details can be found in the procedures

2) Resource

Grade: Robust

Resources: Human Resources assigned responsibility for implementation. Them received a high level of inhouse training on the policy and used the knowledge to develop effective processes in the plant.

3) Communication & Training:

Grade: Robust

Communication & Training: The factory director has received a high level of external training on responsible recruitment and employee rights and has used his knowledge to develop effective processes in place.

4) Monitoring:

Grade: Some Improvements Recommended

Monitoring:HR department check the authenticity and legality of employees' materials to effectively protect employees' rights and interests, but some requirements are overlooked such that there is potential for minor NCs to arise over time.

Summary of findings

Code area Workplace requirement Local law **Finding**

No findings



Systems and evidence examined to validate this code section

- Current systems:

 Based on document review, management and workers interview, all workers in the factory were Chinese. All workers had the proper legal rights to work in this region.

 The factory had established recruitment procedures and employment procedures, and the factory would review the workers' original documents such as ID cards during the recruitment.

- No foreign worker was used by the factory.
 The factory collected related laws on entitlement to work and immigration.
 Based on site manager interviews and worker interviews, no fees such as deposits were required.
 Evidence examined:
 • Hiring and Termination procedure.
 • Duties and responsibilities of the HR Executive.

- Personal files of sampled workers.
- Employee RosterWorker and management 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
Percentage of workers that are migrant	7%
Do any workers migrate from other states, provinces or regions within the country to work at this site?	Yes
List the sending states/provinces/regions	Henan,Anhui



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 recruitment fees were found during the audit.



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

Some Improvements Recommended

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The factory's Procedures for free association of employees policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. Documents clearly assign responsibilities, processes in place and address all code areas - they can be considered robust.

2) Resource

Grade: Some Improvements Recommended

Resources: The Administration Department is responsible for ensuring compliance with the module. However, the plant had not appointed a senior supervisor to be responsible for this module.

3) Communication & Training:

Grade: Robust

Communication & Training: Factories have conducted social responsibility training on respecting employees' freedom of association and right to collective bargaining, teaching them how to effectively collect and communicate employees' concerns. Communication channels were established, with regular meetings and posters for union representatives to inform employees about their activities and the results of discussions with management. All employees know who the union representatives is.

4) Monitoring: Grade: Robust

Monitoring: The meeting room was provided for the worker committee to conduct meeting with management, the factory monitors the frequency and quality of meetings between representatives and management.

Summary of findings

Code area Workplace requirement Local law Finding

No findings



Systems and evidence examined to validate this code section

Current systems:

- The Chinese constitution guarantees Freedom of Association; however, the Trade Union Act prevents the establishment of trade unions independent of the sole official trade union – the All China Federation of Trade Unions (ACFTU). As a consequence, all trade unions of factories in China are under the management of ACFTU. And most of the trade union representatives are appointed directly by it. Additionally, the trade union activity is limited on the right to organize and bargain collectively in China.

 • Based on document review, management interview and worker interview, worker
- representatives were freely elected. They conducted the meeting regularly and meeting records were provided for review.

 • Workers could raise their grievances or complaint to their worker representative or
- management directly. Evidence examined:

- The policy on freedom of association
- Minutes of the worker representative meeting
- Interview with workers and management Worker representative elected 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?	Yes
Are they active?	Trade union of Suzhou Fushilai Pharmaceutical Co., Ltd
Does the employer recognise the trade union?	Yes
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



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

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The facility has announced the highest level of EHS procedures and policy support, including building safety, fire safety, electrical and machine safety, first aid, PPE, and more. The plant's EHS Management Plan policy Outlines a system for managing this issue on site, including some related requirements for the specification area. Risk factors in the working environment are reduced by identifying and determining risks, analyzing and evaluating, controlling and managing risks in EHS and working conditions

2) Resource Grade: Robust

Resources: The factory has designated a supervisor responsible for health and safety senior management representative. This individual has sufficient authority to lead the Health and Safety Committee, ensure that procedures are carried out, and members of the EHS management team have been trained by external agencies. An EHS meeting is held quarterly, attended by the Health and Safety Committee and department heads, to discuss EHS issues and provide updates.

3) Communication & Training: Grade: Some Improvements Recommended

Communication & Training: Communicating EHS policies and procedures to employees annually. The factory provides training for workers and EHS training includes construction safety, fire safety, electrical and mechanical safety, first aid and PPE use. Provide training records for review, Based on employee interviews, employees' understanding of the health and safety training provided by the factory needs to be improved.

4) Monitoring:

Grade: Some Improvements Recommended

Monitoring: Assessment is reviewed in accordance with written procedures at least annually or when process or physical changes occur on site, or in response to any health and safety incident. Internal audits are conducted annually. However, the corrective actions of the internal audit were not comprehensive enough.

Summary of findings

Audit company: Audit reference: End Date: Start Date: 2025-04-27 2025-04-28 SGS_China ZAA600128559



Code area	Workplace requirement	Local law	Finding
3. Working conditions are safe and hygienic	3.F Have a system in place to measure the eff		GE <u>ZAF600915975</u>
Systems and evidence examined	to Current systems:	ment	

validate this code section

- General Health and Safety management
 A Senior Manager was appointed as Health & Safety responsible for the site.
- Potable water was freely available in all areas.
- Sufficient clean toilets segregated by gender were available at all times to workers.
- Ventilation, temperature and lighting were adequate for the production processes.
- Fire Safety
- There were at least 2 exits from each work area.
- Fire equipment was adequate and checked once per month.
- Evacuation diagrams were posted at each work area.
- Fire drills were organized and recorded regularly, and the related records were provided. 3. Elect
- **Electrical safety**
- The electrical equipment was maintained in good condition.
- There was competent electrician at the site and the training certificate was available
- Medical services
- There were adequate first aid kits in each production area and they were well stocked.
- Qualified first aiders were available in the factory.
- Evidence examined:
- Health and safety policy
 Health and safety manual
- Health and safety committee minutes
- Fire equipment maintenance records
- Building structure safety certificate
- Fire safety certificate
 Training records
 Fire drill records

- Accident records
- · Onsite observation
- · Worker interview and management interview

Audit company: Audit reference: Start Date: End Date: SGS_China ZAA600128559 2025-04-27 2025-04-28



Findings: good examples

ZAF600915975

Good example

46

Code area

3 Working conditions are safe and hygienic

Workplace requirement

3.F Have a system in place to measure the effectiveness of health and safety training carried out. Ensure training content is understood/implemented by workers.

Description

The factory has obtained ISO45001 2018 Occupational Health Management System Certificate, number 07623S0850R0M-JS/001, valid until 2026-7-3.工厂获得了ISO45001 2018职业健康管理体系证书,编号为07623S0850R0M-JS/001,有效期到2026-7-3。

Evidence



ISO45001-2018.png

ď



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?	Site owned transport
Who organises worker transportation while at work?	Not applicable
Do all structural additions (e.g. added floors) have a valid permit/inspection report as per local law?	Not Applicable No additional buildings. The acceptance certificate of buildings was provided for
	review.
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
Does the site have a structural engineer evaluation?	Yes



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

Some Improvements Recommended

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

The position of the company is clearly stated in the Child Labour Prevention and Remediation Policy which meets all Workplace Requirements in this code area. The Policy makes reference to the Hiring Procedure, which outlines the key mechanisms in place for preventing underage work and the placement of young workers in unsuitable positions. This procedure includes provision for non-employee (agency) workers. The Remediation Procedure outlines processes and responsibilities, including financial, for undertaking remediation.

2) Resource

Grade: Some Improvements Recommended

Resources: HR manager is assigned responsibility for implementation, and aware of the responsibilities. In the event of a change in position or absence from work, there are appropriate procedures for temporary responsibility. But this role was also taking responsibility for other management, not a dedicated role.

3) Communication & Training:

Grade: Robust

Communication & Training: All employees, from top management to entry - level staff, undergo regular training on child labour laws and the company's zero -tolerance policy. This training includes how to identify signs of potential child labour and the correct procedures to follow if any suspicion arises. Communication channels are established to raise awareness among employees. For example, there is suggestion box for employees to report any concerns confidentially.

4) Monitoring: Grade: Robust

Responsibilities for monitoring implementation of age-verification are defined by the Hiring Procedure. The procedure requires that audit of the records kept of this verification is conducted by the HR leads, increasing to weekly at times of peak hiring. Records are kept of monitoring activities. Any identification of misapplication of procedures, or concerns about application are escalated for action in the weekly HR team calls. For example, some falsified documents were not identified due to the issue of new national ID cards – this was highlighted by internal monitoring and re-training rolled out for key staff.

Audit company:Audit reference:Start Date:End Date:SGS_ChinaZAA6001285592025-04-272025-04-28



Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section

Current systems:

- The factory established a policy on workers recruitment that workers must present their original ID card to proof their ages while recruiting, once workers have joined their original copies of ID card were kept in their personnel file. And the policy stated that the factory never employ and use any child labour under the age of 16 years old.
 The factory established a policy to protect young workers which stated given a regular health check and will be registered with the local labour office, also did not arrange young workers to hazardous post.
 Checks of all workers files showed that the youngest worker on site was 22 years old.
- Checks of all workers files showed that the youngest worker on site was 22 years old who was born on 2003 and joined in the factory on 2024.

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

regarded as young labour.

Evidence examined:

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



4. Child labour shall not be used

Data points

Percentage of workers that are age 24 or younger	2%
Enter the legal age of employment	16
Enter the age of the youngest worker identified	22
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



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

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

The factory's "Employee Manual", "Labour Contract" and "Social Responsibility Management Manual" outline the system for managing this issue on site, including all relevant requirements in the area of the code, further details can be found in the Worker's Manual and the policies of the Labour contract.

The documentation clearly assigns responsibilities, processes, and addresses all areas of code.

2)Resources: Grade: Robust

A senior HR manager was assigned responsibility for implementation and aware of his responsibilities.

HR manager had received a high level of external training on legal wages and used the knowledge to develop effective processes in place, regular training was also given to workers.

3)Communication & Training: Grade: Some Improvements Recommended

Communication & Training: Communication and training: All employees undergo a series of training on the wage policy during their induction, and regular refresher courses are provided to keep employees up to date. Communicate salary related information through various communication channels such as staff meetings, posters, and suggestion boxes, but some workers are still unclear about how their wages are calculated.

4)Monitoring: Grade: Robust

Monitoring: The factory continuously assesses the effectiveness of these procedures through regular monitoring and internal audits and takes action against noncompliance. Employees report issues to plant management representatives through a grievance mechanism and monitor and enforce policies. In addition, employee feedback on wages is closely monitored through informal channels in order to address issues that arise in a timely manner, but some issues still need to be addressed. Considering that manufacturing plants in the region are at risk of inadequate social Most factories cannot quarantee that all workers are covered by social security. But even so, the project still pays social insurance for all eligible workers.

Audit company: Audit reference: End Date: Start Date: 2025-04-27 SGS_China ZAA600128559 2025-04-28



Summary of findings

Code area	Workplace requirement	Local law	Finding
5. Legal wages are paid	5.B Ensure that workers receive the insurance		GE <u>ZAF600915976</u>

Systems and evidence examined to validate this code section

Current systems:

- The local legal minimum wage was RMB 2490 per month since Jan 1, 2024 and all workers' minimum wages were paid in line with local law requirement.
 The payroll records from Apr, 2024 to Mar, 2025 were provided for review.
 All workers' wages were calculated by hourly rate.
 All workers were paid at the 20th 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 particulars of their wages for the pay period concerned each time that they are the particulars of their wages for the pay period concerned each time that they are
- paid.
 The factory provided paid annual leave and other legal leave to workers as per legal requirement.
 • All workers were provided social insurance.

Evidence examined:

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

Audit reference: Audit company: Start Date: End Date: SGS_China ZAA600128559 2025-04-27 2025-04-28



Findings: good examples

ZAF600915976 Good example

Code area

5 Legal wages are paid

Workplace requirement

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

Description

The factory provides free working meals for the workers工厂为工人提供了免费的工作餐

Evidence



canteen.png





5. Legal wages are paid

Data points

What is the basic wage paid to workers?	Wages meet a living wage The legal minimum wage 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 renumeration

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

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
Actual required working hours	Required hours per day	8.0
	Required hours per week	40.0
	Required hours per month	184.0



Maximum legal overtime hours	Max hours per day	3.0
	Max hours per week	Non applicable
	Max hours per month	36.0
Actual overtime hours	Max hours per day	0.0
	Max hours per week	8.0
	Max hours per month	40.0
Minimum legal wage	Min per hour	Non applicable
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	2490.0
Actual minimum wage	Actual per hour	Non applicable
	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	2490.0
Minimum legal overtime wage	Min per hour	21.47
	Min per day	Non applicable
	Min per week	Non applicable
	Min per month	Non applicable
Actual minimum overtime wage	Actual per hour	21.47
, and a man or a time wage	Actual per day	Non applicable
	Actual per week	Non applicable
	Actual per month	Non applicable
Wage analysis		
Number of workers' records checked	78	



Provide the date and details of the records

26 sample employees from Dec 2024 26 sample employees from Jan 2025 26 sample employees from Feb 2025

The factory has provided a comprehensive hourly approval document on a quarterly basis. The last complete salary calculation period was from December 2024 to February 2025. A total of 26 workers from the factory were selected as samples, with the maximum total working hours of the sample being 520 hours, which is less than the quarterly maximum working hours of 608 hours.

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?

Meets legal minimum

Indicate the breakdown of workforce per earnings

100% of workforce earning meet minimum wage.

Are there any bonus schemes used?

No

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 Local law Finding	Code area	Workplace requirement	Local law	Finding
---	-----------	-----------------------	-----------	---------

No findings

Systems and evidence examined to validate this code section

Current systems:

- The factory establishes payroll and benefits procedures and implements, monitors and maintains them.
- After document review and interviews between management and workers, the wages and overtime pay of workers meet the requirements of laws and regulations. The factory conducts a gap analysis on the living wage. The factory uses the Fair Wage Network Typical Family Methodology to calculate the living wage of all factory workers. It also ensures that the basic living requirements of the workers are met, and supervises the implementation of this requirement in accordance with the relevant control procedures established by the factory. Based on the wage records provided by the factory, the factory basic wage is higher than the living wage.
- Review of evidence:
 Payroll and benefits procedures
- Analysis of the gap in living security wages



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

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The plant's Hours of Work Payroll Control Program Policy and Employee Handbook outlines the plant's current system for managing this issue at the site includes all relevant requirements of the code area. Documents clearly assign responsibilities, processes in place and address all code areas

2)Resources:

Grade: Some Improvements Recommended

A senior HR manager was assigned responsibility for implementation and aware of the responsibilities.

3)Communication & Training: Grade:Some Improvements Recommended

All employees have received an internal training on working hours and overtime of training programs and have used their knowledge to develop effective processes in place. Regular communication channels, such as team meetings, bulletin boards, and internal messaging systems, are used to remind employees of the working hour limits and to update them on any changes in the schedule. Due to workers' incomprehension of the training content and incomplete communication, the training

results are different from the ideal results.

4)Monitoring:

Grade: Fundamental Improvements Required

Compliance with the process is monitored directly by HR manager, and effective monitoring mechanism has been developed to prevent and improve overtime. Most factories in this area find it difficult to avoid the risk of working hours exceeding the requirements, but the audited factories still guarantee workers the right not to exceed the regulatory requirements for working hours

Summary of findings

Code area Workplace requirement Local law **Finding**



6. Working hours are not excessive

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

§1

NC ZAF600899360

Systems and evidence examined to válidate 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.

· Attendance records from Apr 1, 2024 to the audit day were provided for review

during audit.

- According to time records and worker interview, the normal working hours were 8 hours per day, 5 days per week. Management and office staffs (1 shift): 8:00-16:00 (meal and rest time was included in the working hours). Production line workers (2 shifts): 8:00-20:00/20:00-8:00(2 hours for meal and rest in day shift and 1 hour for meal and rest in night shift).
- Based on attendance records review, overtime was arranged when necessary. All workers had one day off per seven days.
 Through employees' interview, overtime was voluntary.
 The factory obtained two Consolidated Working Hours System Approvals which were salsulated by quarter the approved periods were from Jun 1, 2022 to May 21, 2024.

calculated by quarter, the approved periods were from Jun 1, 2023 to May 31, 2024 and from Jun 1, 2024 to May 31, 2025.

Review of evidence:

- Payroll and benefits procedures
 Analysis of the gap in living security wages
 Workers interview
- · Management interview
- Attendance records
- Factory policy on working hours
 Sample pay slips with recorded hours of all workers reviewed
- Production records to cross check working hours

Audit company: Audit reference: Start Date: End Date: 2025-04-27 2025-04-28 SGS_China ZAA600128559



Findings: non-compliances

ZAF600899360

Non-compliance

Due 2024-08-09

60

Code area

6 Working hours are not excessive

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.

480 - Overtime is not used responsibly (i.e. extent, frequency and level of hours worked by individual workers and/or whole workforce are excessive)

Total working hours exceeded requirement of Consolidated Working Hours System Approval. The factory obtained two Consolidated Working Hours System Approvals which were calculated by quarter, the approved periods were from Jun 1, 2022 to May 31, 2023 and from Jun 1, 2023 to May 31, 2024.

Based on attendance records from Mar 1, 2023 to the audit day, the total quarterly working hours of 20 out of 26 sampled workers (from all production positions) exceed 608 hours from Mar, 2023 to May, 2023 and Jun, 2023 to Aug, 2023, the maximum working hours was 652 hours from Jun 1, 2023 to Aug 31, 2023. The total working hours from Sep 2023 to Nov 2023 and from Dec 2023 to Feb 2024 did not exceed 608 hours.

工时超综合计时批文要求。 工厂取得了以季度为周期的综合计时批文,有效期从2022年6月1日至2023年5月31日和2023年6月1日至 2024年5月31日。

2023年6月1日至2023年8月31日。2023年9月至2023年11月和2023年12月至2024年2月这两个季度工时 未超608小时。

Description (carried over)

Total working hours exceeded requirement of Consolidated Working Hours System Approval. The factory obtained two Consolidated Working Hours System Approvals which were calculated by quarter, the approved periods were from Jun 1, 2022 to May 31, 2023 and from Jun 1, 2023 to May 31, 2024.

Based on attendance records from Mar 1, 2023 to the audit day, the total quarterly working hours of 20 out of 26 sampled workers (from all production positions) exceed 608 hours from Mar, 2023 to May, 2023 and Jun, 2023 to Aug, 2023, the maximum working hours was 652 hours from Jun 1, 2023 to Aug 31, 2023. The total working hours from Sep 2023 to Nov 2023 and from Dec 2023 to

2023 to Aug 31, 2023. The total working hours from Sep 2023 to Nov 2023 and from Dec 2023 to Feb 2024 did not exceed 608 hours. 工厂取得字以季度为周期的综合计时批文,有效期从2022年6月1日至2023年5月31日和2023年6月1日至2024年5月31日。 根据工厂提供的2023年3月1日至审核当天的考勤,26名抽样员工中20名员工(所有生产岗位)季度总工作时间在2023年3月至2023年5月以及2023年6月至2023年8月超了608小时,最大为652小时,从2023年6月1日至2023年8月31日。2023年9月至2023年11月和2023年12月至2024年2月这两个季度工时主程608小时 未超608小时。

Corrective and preventative actions

The factory should ensure the working hours comply with the requirement of Consolidated Working Hours System Approval. 工厂应确保工时符合综合计时批文要求。

Audit reference: Audit company: Start Date: End Date: SGS_China ZAA600128559 2025-04-27 2025-04-28

Status

Closed (2025-04-28)*

Time given to resolve

90 days

Verification method

Follow up audit

Area of non-compliance/nonconformance

Local law



Corrective and preventative actions (carried over)

The factory should ensure the working hours comply with the requirement of Consolidated Working Hours System Approval. 工厂应确保工时符合综合计时批文要求。

Local law reference

Regulations on the Approval of Variable Hours of Work and Consolidated Hours of Work in Enterprises (1994), Article 5

To employees meeting one of the following conditions, enterprises may apply the system of consolidated hours of work; namely, their hours of work are calculated in clusters of hours worked during a week, a month, a season or a year. However, their average day and averageweek hours of work should be basically the same as those adopting the normal system of hours of work:

- 1. Employees in the transport, railway, post and telecommunications, maritime, aviation, and fishing industries may be required by the nature of their job to work continuous hours;
 2. Employees in such industries as geological and resource exploration, construction, salt manufacturing, sugar production and tourism whose work is regulated by seasonal and natural conditions more than anything else;
- 3. Other employees who are more suited to the system of consolidated hours of work.

Audit company:Audit reference:Start Date:End Date:SGS_ChinaZAA6001285592025-04-272025-04-28

^{*} PDF generated at 11:04 (UTC) on 08 May 2025. <u>View this finding on the Sedex platform</u> 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?	NA
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?	48.0
In the sample, what was the maximum number of hours worked in a single week, including overtime, for any worker at this site?	48.0
Maximum number of days worked without a day off in sample	6



7. No discrimination is practiced

Management systems

Develop and maintain relevant policies and procedures to ensure workplace requirements are met

Some Improvements Recommended

Appoint a manager with sufficient seniority who is responsible for implementing procedures

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Some Improvements Recommended

Explanation for management systems grades

1) Policies & Procedures:

Grade: Some Improvements Recommended

Policies & Procedures: The factory's Prevention of forced labor, discrimination, and harassment control procedures in place to manage this issue at the site includes all relevant requirements of the code area, such as that there will be no discrimination based on factors such as race, gender, age, religion, disability, or national origin in any employment - related decision, including hiring, promotion, training, and termination. The procedures for handling discrimination complaints are well - defined. And further detail can be found in the 'Recruitment and Onboarding' procedure. The policy also stipulates strict sanctions for those found guilty of discriminatory acts to deter such behavior within the organization. But current policy was not mentioned the diversity and Inclusion policy clearly.

2)Resources:

Grade: Some Improvements Recommended

Resources: The factory assigns joint responsibility for the area to the Administration Department, the Human Resources Department and the respective authorities. Specialized staff are trained to handle discrimination cases, including conducting investigations and providing support to affected employees. And there have received a high level of internal training on the policy and used the knowledge to develop effective processes in the factory. But there was no general director appointed for the region.

3)Communication & Training:

Grade:Some Improvements Recommended

Communication & Training: All employees have done a series of relevant training and verified the effectiveness of the training. These training programs cover topics such as understanding different forms of discrimination, the impact of discriminatory behavior on individuals and the organization. The factory uses posters to communicate the anti - discrimination policy and any updates. But no dedicated training for diversity and Inclusion was provided yet.

4)Monitoring:

Grade: Some Improvements Recommended Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, any signs of potential discrimination are investigated promptly. But the monitoring for diversity and Inclusion was not covered.

Audit company: Audit reference: End Date: Start Date: 2025-04-27 SGS_China ZAA600128559 2025-04-28



Summary of findings

Local law Code area Workplace requirement **Finding**

No findings

Systems and evidence examined to validate this code section

Systems:

- The factory established policy and procedure on prohibiting discrimination.
- According to 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 and male worker Female workers and male 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.
 4. There was no evidence of sexual harassment.
- The factory established policy and procedure on recruitment, which included unified interview standards and processes, and the factory provided relevant training to personnel responsible for recruitment. Training records were available for review.
- Based on management interview and worker interview, the factory provided equity learning opportunities for all workers, ensuring that each worker had the opportunity to improve their skills and knowledge. The factory developed the training plan to conduct regular skill training for workers, and training records were available for review. The factory takes into account that everyone's situation is different and provides fair treatment to workers based on their specific circumstances. For instance, workers with a position salary of less than 5,000 do not need to pay personal income tax. For non-local workers, a more suitable vacation system is offered so that they can often return to their hometowns to visit their families.
- 7. The factory established policy and procedure on promotion standards and promotion processes, ensured workers to have a clear understanding of the promotion procedures and requirements. Based on management interview and workers interviews, the factory regularly evaluated workers' job performance to determine their opportunities for promotion.
- Evidence examined:
- Employment procedure and recruitment procedure
- Policies and procedures, such as promotion standards and promotion processes
- Social responsibility manual
- Training records review
- Payroll records review
- Management interview
- Workers' interview
- Onsite observation

Audit company: Audit reference: Start Date: End Date: SGS_China ZAA600128559 2025-04-27 2025-04-28



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)?	8%
Representation of women in managerial roles (ratio of women workers to women managers)	4%
Representation of women in supervisory roles (ratio of women workers to women supervisors)	6%
Three most common nationalities in managerial and supervisory roles	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

Some Improvements Recommended

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

The factory "Social Responsibility Management Manual" and "Employee Manual" outlining the systems in place to manage this issue at the site includes main relevant requirements of the code area, and further detail can be found in the recruitment management procedures and labor contract.

Documents clearly assign responsibilities, processes in place and address all code areas. They could be considered robust.

2)Resources:

Grade: Some Improvements Recommended

Resources: Production Supervisor is assigned for reviewing and updating the policies and procedures. The production Supervisor is only clear about some information of the operational responsibilities, such as communicating the contractual terms prior to recruitment and doesn't know the requirements of using of apprenticeships, temporary, irregular, sub-contracted or non-employment models of labour.

3)Communication & Training:

Grade:Robust

Communication & Training: All employees have done a series of relevant training, such as comprehensive training programs for new hires to ensure they can quickly adapt to their roles and perform well. and verified the effectiveness of the training.

4)Monitoring: Grade: Robust

Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively. If any issues are identified, such as potential overwork or under utilization of staff, corrective actions are taken promptly.

Summary of findings

Code area Workplace requirement Local law Finding



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 by the auditor.

 All interviewed workers had received a signed labour contract.

 Workers' personal files were provided for review.

 Evidence examined:

 Recruitment policy

 The hiring and termination procedure

 Personal files

 Payroll records were provided for review

- Payroll records were provided for review



8. Regular employment is provided

Data points

Percentage of workers that are permanently or temporarily employed	97.25%
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	2.75%
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

Some Improvements Recommended

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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

The factory "Social Responsibility Management Manual" outlining the systems in place to manage this issue at the site includes main relevant requirements of the code area, and further detail could be found in the Internal audit management procedures. Documents clearly assigned responsibilities, processes in place and address all code areas, they could be considered robust.

2)Resources:

Grade: Some Improvements Recommended

Resources: Administration and HR Department are assigned responsibility for implementation, and ware of the responsibilities. But there was no general director appointed for the region. They trained staff members who are knowledgeable about subcontracting best practices, ready to handle the process if it becomes necessary. 3)Communication & Training:

Grade:Robust

Communication & Training: All employees have done a series of relevant training and verified the effectiveness of the training. This includes internal training sessions and announcements during team meetings to ensure that everyone understands the factory's position.

4)Monitoring: Grade: Robust

Monitoring: Employees report relevant issues to the factory management representative through the appeal mechanism, and monitor and implement relevant policies effectively. In the case of homeworkers, the factory has systems in place to monitor the distribution of work tasks to ensure that none are being sent outside the factory premises.

Summary of findings

Code area Workplace requirement Local law **Finding**



No findings

Systems and evidence examined to validate this code section

Current systems:
1.Confirmed by factory management, no sub-contractor was used by the factory.
2.The factory had established social accountability manual including sub-contracting control procedure.

3.No homeworking was identified in the factory.
Evidence examined:
Details:

1.Site tour

2.Materials in/out records

3.Interview with management and workers 4.Social accountability manual 5.Assessment records



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 homeworker?					
Are full records of homeworkers available at the site?					
Does the supplier buy products or services from suppliers that use homeworkers?	No There was no homeworkers used in the factory.				
Sub-contracting					
Are there any concerns about unrecorded work or undeclared sub-contracting on site, giving considerations to the workers' capacity?	No unrecorded work or un	ndeclared sub-contracting	were found during the	audit.	
Are any sub-contractors used?	No				



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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

The factory "Social Responsibility Management Manual" outlining the systems in place to manage this issue at the site included main relevant requirements of the code area, and further detail could be found in the disciplinary procedures.

Documents clearly assigned responsibilities, processes in place and address all code areas, they can be considered robust.

2)Resources: Grade: Robust

A senior HR manager was assigned responsibility for implementation and aware of the responsibilities.

HR manager had received a high level of external training on harsh or inhumane treatment were used responsibly, and had used the knowledge to develop effective

processes in place, it could be considered robust. 3)Communication & Training:

Grade:Robust

Communication & Training: All employees have done a series of relevant training and verified the effectiveness of the training, such as recognizing different forms of harsh or inhumane treatment, understanding the impact of such behavior on individuals and the workplace, and how to prevent it.

4)Monitoring: Grade: Robust

Monitoring: Adherence to the processes is monitored via departmental reporting to the vice manager, and the factory has established a complete mechanism to verify implemented by operational staff.

Summary of findings

Code area Workplace requirement Local law **Finding**

No findings

Audit company: Audit reference: End Date: Start Date: SGS_China ZAA600128559 2025-04-27 2025-04-28



Systems and evidence examined to validate this code section

Current systems:

- *The factory management had established a disciplinary procedure for workers' misbehavior which included oral warning, written warning and finally termination and the site, had developed a training program for all employees 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 in the past.
 *There was an internal process for grievance, such as 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 guestion.
- question.

Evidence examined:

- 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')?	Yes, there is a formal grievance process The grievance process is available to all workers
What type of grievance mechanism(s) are available?	Suggestion box, worker representative, etc.
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

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The factory's EHS Management Program policy outlining the systems in place to manage this issue at the site includes all relevant requirements of the code area. It includes clear guidelines for waste management, with procedures for sorting, storing, and disposing of different types of waste in an environmentally friendly manner. Procedures for handling environmental incidents are in place, including emergency response plans to quickly address any spills, leaks, or other accidents that could harm the environment.

2)Resources: Grade: Robust

Resources: The plant has appointed a EHS manager who is responsible for ensuring compliance of the module, and has received a internal training on the policy and used the knowledge to develop effective processes in the factory.

3)Communication & Training:

Grade:Robust

Communication & Training: All employees have done a series of relevant training, such as how to properly dispose of waste, and how to identify and report environmental risks. The factory uses posters to keep employees informed about environmental goals, initiatives, and any updates to policies or procedures.

4)Monitoring:

Grade: Robust

Monitoring: Adherence to the processes is monitored via departmental reporting to the EHS manager, and the factory conducted regular environmental audits to ensure compliance with internal policies and external regulations. Based on the monitoring results, the factory makes necessary adjustments to its environmental system, whether it's implementing new technologies, modifying procedures, or providing additional training.

Summary of findings

Code area Workplace requirement Local law Finding



10.A. Environment 2-Pillar

10.A.C Have a system in place for identifying...

GE ZAF600915974

Systems and evidence examined to validate this code section

- Current systems:
 The factory learned about the environment impact of their site and took continuously management measures to control the environment impact.

- Based on workers interview, they were trained on environmental protection.
 All legally required environmental documents were provided for review.
 The factory established the environment protection system. Environment policy & procedure was provided for review.
 Evidence examined:
 Environmental policy and procedure.
- Environmental policy and procedure
 Environment, Health and Safety Committee Management System
 Worker and management interview
- Site tour

Audit company: Audit reference: Start Date: End Date: SGS_China ZAA600128559 2025-04-27 2025-04-28



Findings: good examples

ZAF600915974

Good example

77

Code area

10.A Environment 2-Pillar

Workplace requirement

10.A.C Have a system in place for identifying and remediating gaps between their clients' environmental standards and the environmental impact of their own operations.

Description

The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18.工厂获得了ISO14001 2015环境管理体系证书,编号为07623E0340R4M-JS/001,有效期到2026 年03 月18 日。The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025.工厂获得了ISO50001 2010能源管理体系证书,编号为00222EN0673R0M,有效期到2025 年12 月2 日。

Evidence





ISO50001-2018.png

7 ISO14001-2015.png





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?

The factory has obtained the ISO14001 2015 Environmental Management System certificate, number 07623E0340R4M-JS/001, valid until 2026-3-18. The factory has obtained the ISO50001 2010 Energy Management System certificate, with the number 00222EN0673R0M, and the validity period is until December 2, 2025.

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?

No



10.B. Environment 4-Pillar

Summary of findings

Code area	Workplace requirement	Local law	Finding

No findings

Systems and evidence examined to validate this code section

Current systems:

- The factory learned about the environment impact of their site and took continuously management measures to control the environment impact.
- Based on workers interview, they were trained on environmental protection.
 The factory summarized and monitored the energy and resource consumption status periodically, and established the energy conservation and emission reduction plan.
 Evidence examination and procedure

- Environmental policy and procedure
 Environmental emergency plan
 Environmental protection training records
 Energy and resource consumption summary
- Emission reduction plan



10.B. Environment 4-Pillar

Data points

Has the site conducted a risk assessment on the environmental impact of the site, including implementation of controls to reduce identified risks?	Yes
What additional specific environmental policies does the site capture?	Packaging optimization Prioritising local suppliers Responsible use and management of water Zero-waste and recycling protocols Switching to renewable energy sources Sustainable material sourcing Circular economy and resource efficiency
Is there a system for managing client's requirements and legislation in the destination countries regarding environmental and chemical issues?	Yes This is included in the site's internal management system.
Does the site have reduction targets in place to manage climate related risks?	Yes, to reduce scope 1 greenhouse gases (GHGs) Yes, to increase low-carbon energy consumption or production
Are any of these science-based targets?	No, but we anticipate setting one in the next two years
Does the site have reduction targets in place for environmental aspects (e.g. water consumption and discharge, waste, energy and green-house gas emissions: (Scope 1, 2 & 3))?	Yes Water and energy usage, and waste are monitored with reduction targets to reduce costs.
Has the site checked that any sub- contracting agencies or business partners operating on the premises have the appropriate permits and licences and are conducting business in line with environmental expectations of the facility?	Yes The factory had checked business partners operating on the premises have appropriate permits and licences and are conducting business in line with environmental expectations of the facility.

Usage/discharge analysis

	Last full calendar year (2024)	Previous full calendar year (2023)
Total electricity consumption from non- renewable sources (kWh)	36,414,514	35,939,480



Total electricity consumption from renewable sources (kWh)	166,226	156,226
Sources of renewable energy used	Onsite generated	Onsite generated
Types of renewable energy used	Solar	Solar
Total natural gas consumption (kWh)	421,193	390,223
Usage of other purchased fuels	Data not available	Data not available
Has the site completed any carbon footprint analysis?	No	No
Water sources	Local water authority	Local water authority
Does the site use mercury or mercury compounds?	No	No
Water volume used (m3)	438,547	428,420
Water discharged	Sewage treatment plant/Municipal sewage pipe network	Sewage treatment plant/Municipal sewage pipe network
Water volume discharged (m3)	319,730	310,125
Water volume recycled (m3)	86,057	81,008
Total waste produced (mt)	7,014	6,188
Total hazardous waste produced (mt)	5,649	5,420
Waste to recycling (mt)	296	212
Waste to landfill (mt)	0	0
Waste to other (mt)	1,069	1,256
Total product produced (mt)	2,786	2,620



10.C. Business ethics

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

Some Improvements Recommended

Communicate and train employees and other workers, including managers and supervisors, on relevant policies and procedures

Some Improvements Recommended

Monitor the effectiveness of procedures to meet policy and workplace requirements

Robust Management Systems

Explanation for management systems grades

1) Policies & Procedures:

Grade: Robust

Policies & Procedures: The factory has established procedures and policies about business ethics, including anti-corruption, anti-bribery, anti-improper competition, fair competition, etc., that's updated according to legal requirement.

2)Resources:

Grade:Some Improvements Recommended

Resources: The Production Supervisor is assigned responsibility for implement, review and update the procedures and policies. However, specific operational responsibilities for implementing the procedure's are unclear.

3)Communication & Training:
Grade: Some Improvements Recommended

Communication & Training: The factory provides business ethics training to all workers and employees in higher risk positions such as management, finance, purchasing and logistics. The policies and procedures are available and communicated to all workers, however, the factory has failed to assess the effectiveness of the employee training, some interviewed workers didn't know the details about business ethics.

4)Monitoring: Grade: Robust

Monitoring: The factory continuously assesses the effectiveness of these procedures via regular monitoring and internal audits. Also, the factory conducts regular risk assessment to identify potential ethical business hazards. Based on the internal audit result, there was no negative case.

Summary of findings

Code area Workplace requirement Local law Finding

No findings



Systems and evidence examined to validate this code section

- Current systems:
 A senior manager was the designated person responsible for implementing standards concerning Business Ethics, and that site practices were conducted without any corruption and/or bribery.
 The company established a business ethics policy which was communicated to workers through pactors and training.
- workers through posters and training.
 The site had received and read the Business Ethics policy of the auditor/audit company.
 Evidence examined:
 • Business ethics policy

- Training recordsWorker handbookManagement and worker interview



10.C. Business ethics

Data points

Has the site received an official notice, fine or prosecution for any noncompliances with business ethics legislation, regulation, consent or permits (within the last three years)?

No

Provide any certified anti-bribery management systems for the site

No relevant system was available.



Attachments







SMETA-JSASCN25351116-Suzhou Fushilai Pharmaceutical Co., Ltd-Apr 27-28, 2025-Annual-onsitecap.pdf

ď





For more information visit https://www.sedex.com