

The following sample(s) was / were submitted and identified on behalf of the client as:

Sample Description	FOLDING TABLE
Style / Item No.	YCZ-183C
Supplier Name	
Manufacturer Name	
Country of Origin	CHINA
Country of Destination	
Sample Receiving Date	JAN 25, 2018
Test Performing Date	JAN 25, 2018 TO JAN 29, 2018

Test Result Summary	
Test(s) Requested	Result(s)
EN 581-1:2017	PASS
EN 581-3:2017 (Camping use) Excluding Clause 6 instruction for use.	PASS
Summary: 1. For further details, please refer to the following page(s)	

Signed for and on behalf of
SGS-CSTC Co., Ltd. Anji Branch

David Fan
Approved Signatory



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SGS-CSTC Technical Services Co., Ltd.
Anji Branch Hardwares

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Test Conducted: EN 581-3:2017 Outdoor furniture – Seating and tables for camping, domestic and contract use – Part 3: Mechanical safety requirements for tables

Test Result:

Test Item	Test Method & Test Requirement	Test Result
General (EN 581-3:2017, 5.1)		
Before and after the strength, durability and stability tests are carried out, the requirements of EN 581-1:2017 shall be fulfilled.		
General (EN 581-1:2017, 5.1)	In order to avoid physical injury when the product is in its intended position of use, all edges and corners shall be rounded, chamfered or otherwise protected. This applies to: — Tables: Table tops, any part of the underside of the top surface at a distance less than 500 mm from any edge below the table, where a knee and/or an arm can commonly access. All other parts shall be free from burrs, sharp edges and sharp points. Movable and adjustable parts shall be designed so that injuries and inadvertent operation are avoided. It shall not be possible for any load bearing part of the furniture to come loose unintentionally. All parts which are lubricated to assist sliding shall be designed to protect users from lubricant stains when in normal use.	PASS
Tubular components (EN 581-1:2017, 5.2)	There shall be no accessible holes in the ends of tubular components with a diameter between 7 mm to 12 mm and with a depth more or equal to 10 mm. The bottom of tubular legs in contact with the floor shall be closed or capped, however, holes in them are allowed as long as they are not between 7 and 12 mm.	PASS
Shear and squeeze points when erecting, adjusting and folding away (EN 581-1:2017, 5.3.1)	Unless 5.3.2 or 5.3.3 are applicable, shear and squeeze points that are created only during erecting, adjusting or folding away are acceptable providing the user can be assumed to be in control of his/her movements and to be able to cease applying the force immediately on experiencing pain.	PASS
Shear and squeeze points under the influence of powered mechanisms (EN 581-1:2017, 5.3.2)	There shall be no accessible shear and squeeze points created by parts of the furniture operated by powered mechanisms, e.g. mechanical springs and gas lifts.	NA
Shear and squeeze points during use (EN 581-1:2017, 5.3.3)	There shall be no accessible shear and squeeze points created by loads applied during normal use. Shear and squeeze points are not acceptable if there is a risk of injury created by the weight of the user during normal movements and actions, e.g. attempting to move the seating by lifting the seat or by adjusting the backrest. For tables, the loads applied during normal use are the loads used for the following mechanical tests in Table 1 of EN 581-3:2007: — Test 1: Vertical static load on main surface; — Test 4: Vertical static load on ancillary surface; — Test 5: Horizontal durability test.	PASS



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Test Item	Test Method & Test Requirement	Test Result
Glass table tops shall fulfil the requirements in EN 12150-1:2015, Clause 8, fragmentation test, or the mode of breakage (β) according to EN 12600:2002 shall be Type B or Type C.		NA
Holes for parasol in glass table top shall be protected to prevent metal to glass contact.		NA
Stability, strength and durability (EN 581-3:2017, 5.2) The safety, strength and durability requirements are fulfilled after testing in accordance with Table 1 when: a) there are no fractures of any member, joint or component, b) there are no loosening of joints intended to be rigid, c) the table fulfils its functions after removal of the test loads. The product shall not overturn when subjected to the stability tests		
Vertical static load on main surface For tables with a table top surface $> 0.25 \text{ m}^2$ (EN 1730:2012, 6.3.1)	Apply a vertical downward force (for main surfaces with a height $\leq 950\text{mm}$: 300N; for main surfaces with a height $> 950\text{mm}$: no requirement) anywhere on the top that is likely to cause a failure, but not less than 100 mm from any edge. If the table tends to overturn, gradually move the loading point towards the centre of the table until this tendency ceases. If there are several such positions, carry out the test at a maximum of four different positions. Repeat the operation for 10 times, 10s each time.	PASS
Vertical static load on main surface For tables with a table top surface $\leq 0.25 \text{ m}^2$ (EN 1730:2012, 6.3.1)	Apply a vertical downward force of 150N anywhere on the top that is likely to cause a failure, but not less than 100 mm from any edge. If the table tends to overturn, gradually move the loading point towards the centre of the table until this tendency ceases. If there are several such positions, carry out the test at a maximum of four different positions. Repeat the operation for 10 times, 10s each time.	NA
Additional vertical static load test where the main surface has a length $> 1600 \text{ mm}$ (EN 1730:2012, 6.3.2)	Apply two vertical downward forces of 500N simultaneously at points positioned on the longitudinal axis of the table top, 400 mm on either side of the transversal axis. Repeat the operation for 10 times, 10s each time.	PASS
Vertical static load on ancillary surface (EN 1730:2012, 6.3.3)	Apply a vertical downward force of 100N anywhere on the ancillary surface that is likely to cause a failure, but not less than 100 mm from any edge. If the article tends to overturn, load the main table top gradually to prevent overturning. If there are several such positions repeat the test at a maximum of two different positions. Repeat the operation for 10 times, 10s each time.	NA
Horizontal durability test (EN 1730:2012, 6.4.2)	Place a mass of 50 kg (or according to manufacturer's specified load) on the table top at the point most likely to prevent the table lifting off the floor. Apply two alternating horizontal forces of 100N at the table top level, one at one end of the table 50 mm from one corner/edge and one at the opposite end/edge. Repeat the procedure at the other corner positions. Repeat the operation for 5000 cycles	PASS



Test Item	Test Method & Test Requirement	Test Result
Stability under vertical load (EN 1730:2012, 7.2)	Test for tables that are or can be set to a height ≤ 950 mm (EN 1730:2012, 7.2.2). The table shall be set to the height most likely to overturn the table, but not more than 950 mm. The table shall not overturn when applying the specified vertical force as Table 2 at 50 mm from the outer edge of the table top on that side where the force is most likely to cause overturning as far away from the supports as possible. Repeat the test at each position where there are multiple positions that may cause overturning.	PASS
	Test for tables that are or can be set to a height > 950 mm (EN 1730:2012, 7.2.3). The table shall be set to the height most likely to cause overturning, but not less than 950 mm. The table shall not overturn when applying 50 % of the specified force as Table 2 at 50 mm from the outer edge of the table top on that side where the force is most likely to cause overturning as far away from the supports as possible. Repeat the test at each position where there are multiple positions that may cause overturning.	NA
Stability for tables with extension elements (EN 1730:2012, 7.3)	Load each extension element to 0.2kg/dm^2 . For tables with extension elements not fitted with interlocks, open all extension elements in the least favourable combination. For tables with extension elements fitted with interlocks, open the two extension elements with the largest loads without overriding the interlock. If an interlock device prevents any two of the extension elements from being opened simultaneously, open the extension element with the largest load. The table shall not overturn when the specified vertical force as Table 2 is applied at the centre of the front of the table 50 mm from the edge.	NA
Stability of tables designed to support a parasol (EN 1730:2012, 7.4)	This test only applies to tables that do not require parasols to be used with their own bases. Secure the steel test tube in the table's fixture for holding parasols. Apply a horizontal force F of 30 N at a height h of 2200 mm.	NA



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Test Item	Test Method & Test Requirement	Test Result
Information for use (EN 581-3:2017, 6)		
Information for use (EN 581-3:2017, 6)	<p>Instruction for use shall be provided in the language(s) of the country where the tables are sold. These instructions shall be headed "IMPORTANT, RETAIN FOR FUTURE REFERENCE: READ CAREFULLY" in letters no less than 5 mm high, unless if the following information is permanently marked on the product.</p> <p>It shall contain at least the following details:</p> <p>a) name and address of the manufacturer/supplier/retailer;</p> <p>b) conditions for use of the product (domestic, camping or contract).</p> <p>If applicable:</p> <p>c) assembly instructions;</p> <p>d) instructions for the care and maintenance of the table;</p> <p>e) tables which have a hole for a parasol, but which are not intended to support a parasol alone, a warning indicating that a parasol shall always be used with a suitable base.</p>	NP

Remark:

- Type of Furniture:
Camping use: outdoor furniture foldable or knock-down and light-weight, intended for use in connection with camping and travelling
- NA=Not applicable; NP=Not provided



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Photo Appendix



Sample as received - View 1



Sample as received - View 2



Sample as received - View 3

Blank

SGS authenticate the photo on original report only

End of Report

Auditee :

Audit Date From : **11/12/2018**

Audit Date To : **13/12/2018**

Expiry Date of the Audit : **Please refer to the producer profile in the amfori BSCI platform**

Auditing Company : **APCER**

Auditor's Name(s) : **Alina Tao(Lead)**

Auditing Branch (if applicable) :



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Rating Definitions



Rating	A combination of ratings per Performance Area where:	Consequence																																							
A Very Good	<ul style="list-style-type: none">• Minimum 7 Performance Areas rated A• No Performance Areas rated C, D or E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr></table>	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	A	B	B	B	A	A	A	A	A	A	A	B	B	B	B	B	B	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
A	A	A	A	A	A	A	A	A	A	A	A	A																													
A	A	A	A	A	A	A	A	A	A	B	B	B																													
A	A	A	A	A	A	A	B	B	B	B	B	B																													
B Good	<ul style="list-style-type: none">• Maximum 3 Performance Areas rated C• No Performance Areas rated D or E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td></tr><tr><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td></tr></table>	A	A	A	A	A	A	B	B	B	B	B	B	B	A	A	A	A	A	B	B	B	B	B	B	B	C	B	B	B	B	B	B	B	B	B	B	C	C	C	The auditee has the level of maturity to maintain its improvement process without the need for a follow-up audit.
A	A	A	A	A	A	B	B	B	B	B	B	B																													
A	A	A	A	A	B	B	B	B	B	B	B	C																													
B	B	B	B	B	B	B	B	B	B	C	C	C																													
C Acceptable	<ul style="list-style-type: none">• Maximum 2 Performance Areas rated D• No Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>C</td><td>C</td><td>C</td><td>C</td></tr><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td></tr><tr><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td></tr></table>	A	A	A	A	A	A	A	A	A	C	C	C	C	A	A	A	A	A	B	B	B	B	C	C	C	D	C	C	C	C	C	C	C	C	C	C	C	D	D	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
A	A	A	A	A	A	A	A	A	C	C	C	C																													
A	A	A	A	A	B	B	B	B	C	C	C	D																													
C	C	C	C	C	C	C	C	C	C	C	D	D																													
D Insufficient	<ul style="list-style-type: none">• Maximum 6 Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td></tr><tr><td>A</td><td>A</td><td>A</td><td>B</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</td><td>D</td><td>D</td><td>E</td></tr><tr><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr></table>	A	A	A	A	A	A	A	A	A	A	D	D	D	A	A	A	B	B	B	C	C	C	D	D	D	E	D	D	D	D	D	D	D	D	E	E	E	E	E	The auditee needs follow up to support its progress. Following the completion of the audit, the auditee develops a Remediation Plan within 60 days.
A	A	A	A	A	A	A	A	A	A	D	D	D																													
A	A	A	B	B	B	C	C	C	D	D	D	E																													
D	D	D	D	D	D	D	D	E	E	E	E	E																													
E Unacceptable	<ul style="list-style-type: none">• Minimum 7 Performance Areas rated E These are three examples: <table><tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr><tr><td>A</td><td>A</td><td>B</td><td>B</td><td>C</td><td>D</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr><tr><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td><td>E</td></tr></table>	A	A	A	A	A	A	E	E	E	E	E	E	E	A	A	B	B	C	D	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	E	amfori BSCI Participants shall closely oversee the auditee's progress as the producer may represent a higher risk than other business partners.
A	A	A	A	A	A	E	E	E	E	E	E	E																													
A	A	B	B	C	D	E	E	E	E	E	E	E																													
E	E	E	E	E	E	E	E	E	E	E	E	E																													
Zero Tolerance	A Zero Tolerance Issue was identified (see amfori BSCI System Manual Part V – Annex 5: amfori BSCI Zero Tolerance Protocol)	Immediate actions are required. The amfori BSCI Zero Tolerance Protocol is to be followed.																																							

Main Auditee Information



Name of producer :			
DBID number :			
Audit ID :			
Address :			
Province :		Country :	China
Management Representative :			
Contact person:	MINGXIANG ZHANG	Sector :	Non-Food
Industry Type :	Accessories	Product group :	other accessories (please specify)
Product Type :	Furniture		

Audit Details



Audit Range :	<input type="checkbox"/> Full Audit	<input checked="" type="checkbox"/> Follow-up Audit	
Audit Scope :	<input checked="" type="checkbox"/> Main Auditee	<input type="checkbox"/> Main Auditee & Farms	
Audit Environment :	<input checked="" type="checkbox"/> Industrial	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Small Producer
Audit Announcement :	<input checked="" type="checkbox"/> Fully-Announced	<input type="checkbox"/> Fully-Unannounced	<input type="checkbox"/> Semi-Announced
Random Unannounced Check (RUC) :	No		
Audit extent (if applicable) :	none		
Audit interferences or contingencies (if applicable) :	none		
Overall rating :	C		
Need of follow-up :	Yes	If YES, by :	13/12/2019

Rating per Performance Area (PA)

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

Executive summary of audit report

ZHEJIANG LIFAN FURNITURE CO., LTD. is located at Si'An Industrial Park, Si'An Town, Changxing Country, Huzhou City, Zhejiang Province, China as Business License. Based on the Business license and on the interview with the Manager, the actual production site is in line with the legal registered address. The company started their operations in Dec 2007 the current location. The factory's local name is "浙江利帆家具有限公司: 91330522670251829T(1/1)".

In view of the facilities, the building area of facilities is around 35054 square meters. There are a total of five buildings in the audited site which is owned by the factory. The factory used one 4-storey building for office & canteen, used four 1-storey buildings for production & warehouse; no other factory was located in same factory yard. The buildings got Fire Prevention Certificates from the local Fire Brigade: 长公消验[2008]第83号, 备案号: 33008221NYS180259, 备案号: 330000WYS110001595. Based on documents checked, site observation and interview, fire safety issues were managed effectively, it was noted that all emergency exits were all unlocked on the day of the audit.

The employees were 180 locals and 160 migrants, and all employees were hired by the factory directly. In view of the employees and managements, the factory did not provide dormitory to employees, all employees go to home or rent house outside, if employees rent a house outside, it costs about RMB 300 per month, the factory had no subsidy in this respect; the factory provide canteen to employees, and employees had their own right to choose to eat in the factory as they have provided or not, it was free for employees to eat in factory canteen.

Based on the audit booking, there were totally 340 employees in the factory, including 180 male employees and 160 female employees currently working in the factory. No children or young workers worked in the factory and the youngest born in Feb 2000, employed in Oct 2018. There were 310 production employees (including packing, production, warehouse) and 30 non-production employees (including office worker, management persons, services).

There was no Trade Union or worker committee available in the factory, but there were 3 worker's representative elected by workers.

The main product manufactured by the factory was furniture.

The main production processes were listed as follows: injection molding, blow molding, cutting, stamping, welding, spraying, sewing, assembling, packing. The main production machines or equipment are: 13 blow molding machines, 6 injection molding machines, 50 punch presses, 35 welding machines, 8 drilling machines, 1 spraying line, 4 assembly lines.

The factory has no obvious off-season and peak season.

Concerning the fire safety management, based on documents checked, site observation and interviews, the auditee has established health and safety committee and conducted risk assessment; the relevant policy and procedures were available for review; the training included fire drill & evacuation exercise provided to workers regularly; emergency exits fulfill the legal requirements and are marked legibly for easy evacuation during emergencies, and they were kept open during the audit; evacuation plans were posted inside plant and emergency lights were installed at all of the designated places of the production floor and staircase; enough firefighting equipment such as fire extinguishers, hydrants and alarms were installed in place, maintained by regular checks and kept in good condition, which were also confirmed by onsite check and test randomly during the audit.

Attendance records from Dec 2017 to the audit date and payroll records from Dec 2017 to Oct 2018 were reviewed in this audit. By cross check those records, production records and interview with the management, workers and worker representative, the regular working time is 8 hours per day and 5 days per week; there was 1 shift production from 7:30 to 16:30 with 1.0 hour lunch break from 11:30 to 12:30; and there were 3 shifts production for injection molding workers, blow molding workers, security staffs, the first shift was from 7:00 to 15:00 with 0.5 hour for break from 11:30 to 12:00, the second shift was from 15:00 to 23:00 with 0.5 hour for break from 17:00 to 17:30, the third shift was from 23:00 to 07:00 with 0.5 hour for break from 06:00 to 06:30; there was 1 shift production for kitchen workers, they from 8:30 to 17:30 with 1 hour for break from 12:30 to 13:30; the 1 shift production workers generally had overtime work at night from 17:00 to 19:00 and on Saturday for 8 hours from 7:30 to 16:30, but they always rested on Sundays and public holidays; Fingerprint attendance system was used for time recording; all employees' wages were calculated by hourly-rate and the lowest basic wage was RMB 1914 per month equivalent to RMB 11.00 per hour which met local legal minimum payment requirement (RMB 1660 per month equal to RMB 9.54

per hour); for overtime wages, 150% and 200% of basic wages were paid to employees for their overtime hours on workdays and rest days respectively, no overtime was arranged on public holidays. The auditee did not provide the information on fair remuneration scan or living wage prior to the audit, because they did not know how to finish it. Based on the payrolls provided by factory, the lowest normal wage was RMB 1914 / month for workers, which was less than local living wage (RMB 2041 / month) calculated by the auditor. The lowest normal wage and living wage did not include the overtime wage.

Employees are paid in cash within 30 days of the following month; based on documents checked, site observation and interviews, six months(May to Oct 2018) for which social insurance receipt be verified that: only 225 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance, injury insurance, the percentage of workers that was covered by the five types of social insurance was 66%; The auditee had provided commercial accident insurance for 136 employees, the valid period is from Jan 9, 2018 to Jan 8, 2019, the percentage of workers that was covered by commercial insurance was 40%; some of the employees were migrants, they want to buy social insurance in their hometown; some local employees were close to retirement, they feel that buying social insurance was not cost-effective, and they do not want to buy it; moreover some local employees bought the cooperative medical insurance in the village, they feel that the personal portion of social insurance payment is too expensive. The factory did not provide proof that these employees gave up the purchase of social insurance; the factory did not provide proof that rural pension insurance status. The factory didn't get written waiver obtained from the local social insurance bureau.

Twenty employees were interviewed, including 13 males and 7 females. Interviewees were satisfied with the working condition and management system in the facility. The facility management and workers (representative) showed a positive attitude to this audit during the whole process. The audit was basically fulfilled according to the audit plan sent prior to the audit. At the end of the audit, all the findings were accepted by the auditee. The performance areas which needed improvement were as follows: PA1, PA2, PA5, PA6, PA7, PA10, PA12.

There were no subcontractors with the factory.

The auditor reminded the factory that they should submit the remediation plan into the BSCI Platform within 60 days. The management was receptive of all the findings and gave the willingness to take appropriate corrective actions.

The auditee's part production process is more complex, it is easy to produce waste gas, noise, dust; and the working environment can also have an impact on employees' health. On the whole, based on documents checked, site observation and interviews, the auditee could carry out compliance production according to local government requirements.

During the audit, some isolated minor findings observed in the audit have been corrected by the auditee before the end of the audit, for example: the packaging workshop had increased the escape map.

No other serious issue was noted in this audit.

Ratings Summary



Auditee's background information			
Auditee's name :		Legal status :	
Local Name :		Year in which the auditee was founded :	
Address :		Contact person (please select) :	
Province :		Contact's Email :	
City :		Auditee's official language(s) for written communications :	
Region :	North East Asia	Other relevant languages for the auditee :	None
Country :	China	Website of auditee (if applicable) :	None
GPS coordinates :		Total turnover (in Euros) :	23056842.00
Sector :	Non-Food	Of which exports % :	99.00
Industry :	Accessories	Of which domestic market % :	1.00
If other, please specify :	N/A	Production volume :	130,000 pieces per year
Product Group :	other accessories (please specify)	Production cost calculation :	Yes
If other, please specify :	Furniture	Lost time injury calculation cost :	No
Product Type :	Furniture		

Auditee's employment structure at the time of the audit		
Total number of workers :	340	Total number of workers in the production unit to be monitored (if applicable) :
		0
	MALE WORKERS	FEMALE WORKERS
Permanent workers	180	160
Temporary workers	0	0
In management positions	13	10
Apprentices	0	0
On probation	0	0
With disabilities	0	0
Migrants (national citizens)	90	70
Migrants (foreign citizens)	0	0
Workers on the permanent payroll	180	160
Production based workers	161	149
With shifts at night	36	28
Unionised	0	0
Pregnant	-	0
On maternity leave	-	0

Finding Report



Performance Area 1 : Social Management System and Cascade Effect

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: D

Deadline date:10/12/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The overall observation shows that the auditee has established a management system to ensure daily operations work in line with BSCI conduct of code, social responsibility policy was issued. The BSCI COC in local language was posted on the notice board in the factory. Mr. Zhang Mingxiang / Factory manager was responsible that the BSCI social requirements. The COC and TOI were signed before this audit. Internal audit and management review were conducted by auditee. Company had communicated the social compliance code with its significant suppliers by providing the copy of BSCI code of conduct to them, the auditee manages its business relations in a responsible manner. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation:

整体观察表明被评估企业已建立了管理系统, 确保日常运营工作与BSCI行为准则一致, 企业已建立了社会责任政策。中文版的BSCI行为守则张贴在企业内的广告板上。工厂经理张明祥先生负责BSCI社会责任要求。企业在评估前已签了BSCI COC和TOI。工厂对其体系进行了内审和管理评审。工厂将BSCI行为准则发送给了其重要供应商并在遵守行为准则方面进行了沟通, 被审核方以负责任的方式管理其业务关系。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距:

- 1.1 -** The result of follow-up audit on 11 Dec 2018: open It was noted that management system was not operated effectively, need to continuous improvement in management. Because it was noted that the social management system was not implemented effectively, and some non-compliance was detected on Performance area PA1, PA2, PA5, PA6, PA7, PA10, PA12.
2018年12月11日跟进审核结果:未关闭。工厂的管理体系没有有效运行, 需在管理上进行持续改进。因为在评估中发现, 管理体系不够完善, 在执行领域PA1, PA2, PA5, PA6, PA7, PA10, PA12发现不符合项。
- 1.4 -** The result of follow-up audit on 11 Dec 2018: open It was noted that the auditee did not effectively evaluate the production capacity, human resource and equipment status against the delivery requirement to avoid the excessive overtime work. The auditee should arrange the production plan reasonably.
2018年12月11日跟进审核结果:未关闭。被审核方接受订单时未能根据客户的交货期, 及时有效的评估自己的生产能力, 人员和设备情况, 以避免出现加班超时的情况。工厂应合理安排生产计划。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: D

Deadline date:11/03/2018

Good practices

None

Areas of improvement

The auditee had set up an effective management system to implement the BSCI Code of Conduct. The factory had appointed Mr. Wang You Jie/Vice General Manager, to ensure that the BSCI values and principles were followed in a satisfactory manner. Based on satisfactory evidence, the main auditee partially respects this principle because:

工厂已经建立了有效的社会责任管理体系, 以保证BSCI行为准则的执行。副总王优杰先生被任命为总负责人, 负责BSCI行为准则的贯彻落实。基于满意的证据, 被审核方部分满足条款:

- 1.1 -** Through document review, site observation, management, worker representative and workers' interview, it was noted that the auditee had set up management system to compliance with the BSCI Code of Conduct, but some policies were improperly implemented, and did not monitor the management system accurately.
通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 发现被审核方已经建立了社会责任管理体系以符合BSCI行为准则, 但部分制度没有执行到位, 并且对其社会责任体系执行情况监管不到位。
- 1.4 -** Through document review, management, worker representative and workers' interview, it was noted that the auditee did not effectively evaluate the production capacity, human resource and equipment status against the delivery requirement to avoid the excessive overtime work. The auditee did not establish a contingency plan for abrupt shutdown or stoppage in the work flow.
通过文件审核, 管理者, 员工代表和员工访谈, 发现被审核方接受订单时未能根据客户的交货期, 及时有效的评估自己的生产能力, 人员和设备情况, 以避免出现加班超时的情况。被审核方没有建立一个关于突发事件停产的意外计划。

Remarks from Auditee

agreed with the auditor and will correct the finding as soon as possible

Performance Area 2 : Workers Involvement and Protection

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A

Deadline date:10/12/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The auditee had set and publicly stated their mission, vision and objective, which also refer to BSCI COC. Satisfactory evidence had shown that there were freely-elected worker representatives, who meet and communication with management at least twice per year. An annual training plan was established. Training record on health, safety, work rule and working skills which provided for employees were documented. This follow-up audit conducted on 11 Dec 2018: PA2.1 there was ongoing communication about requirements of social responsibility between the management and workers in past 12 months. PA2.4 The auditee had posed the BSCI Code of Conduct publicly, and provided BSCI training with all employees, and through document review, site observation, management, worker representative and workers' interview, the managers and the workers representatives were quite aware of BSCI values and principles. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation:

受审核方参照了BSCI行为守则, 公开表示他们的使命、愿景和目标。令人满意的证据表明, 有自由选举的工人代表, 与管理人员交流至少每年两次, 企业建立年度培训计划。企业对员工的健康、安全、工作规则和工作技能进行了培训, 且保存了培训记录。2018年12月11日跟进审核结果: PA2.1 被审核方管理层与员工之间关于社会责任的双向沟通在过去12个月有进行过。PA2.4 被审核方已经在厂内张贴了BSCI行为准则, 并且为员工提供了BSCI行为准则的培训, 通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 管理人员和员工非常清楚BSCI的标准和原则。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距:

- 2.5 -** New finding on 11 Dec 2018: It was noted that grievance mechanism procedure was established, but the grievance mechanism did not contain the management of any potential conflicts of interest and how to handle them.
2018年12月11日新问题: 工厂建立了申诉管理机制, 但是申诉机制中也未制定防止利益冲突的管理措施。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: C

Deadline date:11/03/2018

Good practices

None

Areas of improvement

Based on satisfactory evidence, auditors found that factory provided the BSCI code training records for review. The established grievance mechanism was including all interested parties. Based on satisfactory evidence, the main auditee partially respects this principle because:

基于满意的证据, 审核员发现工厂有提供进行关于BSCI行为准则的培训记录, 工厂有建立申诉机制包含所有利益相关方。基于满意的证据, 被审核方部分满足条款:

- 2.1 -** Through document review, management, worker representative and workers' interview, it was noted that there was no ongoing communication about requirements of social responsibility between the management and workers in past 12 months.
通过文件审核, 管理者, 员工代表和员工访谈, 发现被审核方管理层与员工之间关于社会责任的双向沟通在过去12个月未进行过。

- 2.4 -** Through document review, site observation, management, worker representative and workers' interview, it was noted that though the auditee posed the BSCI Code of Conduct publicly, provided BSCI training with all employees, the managers and the workers representatives were not quite aware of BSCI values and principles.
通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 发现了尽管被审核方已经在厂内张贴了BSCI行为准则, 并且为员工提供了BSCI行为准则的培训, 但管理人员和员工并不是非常清楚BSCI的标准和原则。

Remarks from Auditee

agreed with the auditor and will correct the finding as soon as possible

Performance Area 3 : The rights of Freedom of Association and Collective Bargaining	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: There was no finding for this PA in the last audit, so not rated for it in this audit. 在上次审计中这个章节没有发现问题, 所以这次审计中没有对其进行评级。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The factory had established management system regarding Collective Bargaining & Freedom of Association. Based on satisfactory evidence, Auditors noted that all workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. The employer adopts an open attitude towards the activities of trade unions and their organizational activities. Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace. 工厂已经建立了自由结社和集体谈判的管理体系。基于满意的证据, 审核员发现所有工人有权利自行组织工会和进行集体谈判。雇主对工人组织工会已经进行的活动持开放的态度。员工代表履行其职能时, 不会受到雇主的任何方式的歧视。	
<u>Remarks from Auditee</u>	
Performance Area 4 : No Discrimination	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: There was no finding for this PA in the last audit, so not rated for it in this audit. 在上次审计中这个章节没有发现问题, 所以这次审计中没有对其进行评级。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The factory had established anti-discrimination procedure. Based on satisfactory evidence, it was noted that there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. 工厂已经建立了反歧视程序文件。基于满意的证据, 发现工厂不因种族, 阶级, 国籍, 宗教, 年龄, 性别, 婚姻状态, 性取向, 有无参与工会或者政治倾向等对员工有所歧视, 所有员工在招聘, 工资报酬, 培训, 升迁, 离职等方面有同等的机会。	
<u>Remarks from Auditee</u>	

Performance Area 5 : Fair Remuneration

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A

Deadline date:10/12/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The Legal minimum wage document was collected by the auditee. Payrolls of 20 samples from Dec 2017 to Oct 2018 were reviewed randomly. Legal minimum wage was from RMB1660 / month equal to 9.54 / hour since Dec 1, 2017. The factory minimum wage was RMB11.00 / hour. Wage was calculated at hourly rate. The workers' overtime work was compensated legally. Wage was paid by cash at 30th of following month. The pay slip was provided to workers. Paid holidays were provided. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation:

企业收集了法定最低工资文件。随机抽了20名来自不同部门的工人从2017年12月至2018年10月的工资记录。当地的最低工资标准从2017年12月1号开始调整为RMB1660元等同与每小时RMB9.54元。企业支付工人的最低工资为人民币11.00元每小时。员工的加班工资依法得到补偿。每个月30号发上月工资。工资单提供给了员工。带薪休假已提供。但是，基于令人满意的证据，主要审核方没有完全尊重这个原则，在执行中存在以下差距：

- 5.5 -** The result of follow-up audit on 11 Dec 2018: open It was noted that the insufficient social insurance participated. Through document review, auditor found that there were total 340 employees in the auditee, however, only 225 employees had participated in basic endowment insurance, unemployment insurance, basic medical insurance, maternity insurance, injury insurance, the percentage of workers that was covered by the five types of social insurance was 66%; The auditee had provided commercial accident insurance for 136 employees, the valid period is from Jan 9, 2018 to Jan 8, 2019, the percentage of workers that was covered by commercial insurance was 40%. The factory did not provide proof that these employees gave up the purchase of social insurance; the factory didn't get written waiver obtained from the local social insurance bureau. (The PRC Labor Law article 72)

2018年12月11日跟进审核结果：未关闭。社会保险参保不足。在文件审阅中，审核员发现被审核方的340名员工中，只有225人参加养老保险，失业保险，医疗保险，生育保险，工伤保险，这五项保险的参保比例是66%；被审核方为136名员工提供了商业意外伤害保险，有效期为2018年1月9日至2019年1月8日，商业保险的参保比例是40%。工厂不能提供员工社会保险的弃保证据，工厂不能提供地方劳动与社会保障局开具的社会保险豁免批文。（中华人民共和国劳动法第72条）

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: B

Deadline date:11/03/2018

Good practices

None

Areas of improvement

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 paid. Deductions from wages as a disciplinary measure were not noted. Based on the review of sampled population employees' time and payroll records, it was noted that all sample employees were paid at least RMB 10.8/hour for normal working hours, which met the local minimum wage standard of RMB 9.54/hour since December 1, 2017. Besides, all sampled employees were paid at legal rate of 150% and 200% for overtime hours worked on weekdays and weekends respectively. No overtime hours were noted at statutory holidays. Based on satisfactory evidence, the main auditee partially respects this principle because:

所有员工在入职时，都会有一份书面的合同来明确其工资福利的条款；并且每次发工资时，员工都会得到一份工资清单。没有发现惩戒性质的罚款。从2017年12月1日起，当地最低工资是每小时9.54元；审核员抽样的工资记录里，最低小时薪是人民币10.8元，符合当地最低工资标准。工人的平时晚上加班被支付了150%的加班费；周末加班被支付了200%的加班费。没有发现法定节假日加班的现象。基于满意的证据，被审核方部分满足条款：

- 5.4 -** Through document review, management, worker representative and workers' interview, it was noted that the auditee did not do any survey or calculating of the local living wage before the audit.
通过文件审核，管理者，员工代表和员工访谈，发现被审核方没有对当地最低生活需求工资进行核算。
- 5.5 -** Through document review, management, worker representative and workers' interview, it was noted that there were 330 employees working in the facility. As per the social insurance receipt, in November 2017, the facility provided 179 employees with 5 types of social insurance including retirement, illness, maternity, unemployment and work-related injury insurances, provided all the rest employees with work-related injury insurance. In accordance with PRC Labor Act (1995), Article 72&73.
通过文件审核，管理者，员工代表和员工访谈，发现工厂共有330名员工，而根据提供的社保缴费凭证，在2017年11月，工厂给179名员工提供了包含养老，医疗，生育，失业和工伤在内的五险，给剩余员工都提供了工伤保险。

Remarks from Auditee

agreed with the auditor and will correct the finding as soon as possible

Performance Area 6 : Decent Working Hours

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: D

Deadline date:10/12/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

Normal working hour was 8 hours per day and 5 days per week. One shift was arranged: working hours 7:30-11:30, 12:30-16:30, and if needed, overtime started from 17:00 to 19:00; and there were 3 shifts production for injection molding workers, blow molding workers, security staffs, the first shift was from 7:00-15:00, the second shift was from 15:00-23:00, the third shift was from 23:00-07:00. Time records from Dec 2017 to audit day were reviewed randomly. Time records for 21 workers from different workshop were randomly selected for review. Electronic data processing system was accessed. Maximum 2 hours overtime per day 18 hours per week, 94 hours per month and 1 day off after 6 days consecutive working days was guaranteed. During the worker interview, workers confirmed that they worked overtime voluntarily. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation:

正常工作时间为每天8小时, 每星期5天。工厂安排了一个班次, 工作时间: 7:30-11:30, 12:30-16:30, 如果需要加班: 17:00至19:00; 注塑、吹塑、保安实行三班制, 第一班从7:00-15:00, 第二班从15:00-23:00, 第三班从23:00-7:00。随机抽了20名来自不同车间的工人从2017年12月至审核当日的考勤记录。企业用电子考勤处理系统记录员工的考勤。员工每天最高加班2小时, 每周最高加班18小时, 每月最高加班94小时, 6天连续工作后休息1天。在员工访谈时, 工人们反映他们加班是自愿的。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距:

- 6.2 -** The result of follow-up audit on 11 Dec 2018: open Based on 20 sample workers' overtime records and payroll from three sampled months (Mar, Aug, Oct 2018) provided by the factory, it was noted that the selected workers' monthly overtime were 94 hours in Mar 2018, 86 hours in Aug 2018, 80 hours in Oct 2018, exceeded legal overtime limit: 36 hours per month. The maximum monthly work time is 94 hours. (The PRC Labor Law article 41)
2018年12月11日跟进审核结果: 未关闭。基于抽样20名员工2018年3月, 8月, 10月的考勤记录发现, 抽取的员工在2018年3月加班时间为94小时, 2018年8月加班时间为86小时, 2018年10月加班时间为80小时。最大月加班时间为94小时/月。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: D

Deadline date:11/03/2018

Good practices

None

Areas of improvement

Their regular work days were from Monday to Friday with 8 hours per day. General work shift was 7:30-11:30/13:00-17:00. The factory used swiping card system to register workers' attendance status. The employees' maximum overtime working hours were 2 hours per normal work day and 64 hours per month. The maximum total working hours per week were 56 hours. The longest consecutive days worked were 6 days. From the holistic approach, it did not impact other performance areas. No one looks tired in the working time, no worker injured due to the overtime working during the last 12 months, no forced labor was noted, all the overtime hours were voluntary, no sub-contractor or home worker noted. Based on satisfactory evidence, the main auditee partially respects this principle because:

工厂的常规工时是每周5天, 每天8小时。正常班次是7:30-11:30/13:00-17:00。工厂采用打卡机来记录员工的考勤状态。抽样的考勤里面, 员工每天最多加班2小时, 每月加班最多64小时。每周的总工作时间最多是56小时。最多连续工作6天之后有至少一天休息。通过整体分析, 这并不影响其他的部分。在工作时间没有员工看起来很疲惫, 在过去12个月内没有员工因为加班导致工伤, 没有发现强迫劳工, 全部加班都是自愿的, 没有外发或者家庭工。基于满意的证据, 被审核方部分满足条款:

- 6.2 -** Through document review, site observation, management, worker representative and workers' interview, based on 25 sample workers' overtime records and payroll from three sample months provided by the factory, it was noted that all 9 randomly selected workers' overtime hours were 60 hours in November 2017(recent month), all 8 randomly selected workers' overtime hours were 52 hours in October 2017(random month) and all 8 randomly selected workers' overtime hours were 64 hours in September 2017(random month) which exceeded legal overtime limit: 36 hours per month. In accordance with PRC Labor Act (1995), Article 41.
通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 发现根据25名员工的考勤记录, 2017年11月份(当前月)抽样的全部9名员工的月加班为60小时, 2017年10月份(随机月)抽样的全部8名员工的月加班为52小时, 2017年9月份(随机月)抽样的全部8名员工的月加班为64小时, 超过法定要求的月加班时间36小时。

Remarks from Auditee

agreed with the auditor and will correct the finding as soon as possible

Performance Area 7 : Occupational Health and Safety

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: B

Deadline date:10/12/2019

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The auditee made effort to manage safety, the factory had documented health and safety management procedures and manuals. Relevant implementation records including risk assessment document, health and safety training evidence, fire and evacuation drill log, fire device check records were provided for review. During onsite walk through, it was noted that the facility premise was structurally safe as there was no visible defect found during the audit. Factory floor were found organized and clean during the audit. Emergency exits were provided and marked legibly for easy evacuation during emergencies. Fire alarms were installed. The latest fire drill was conducted on 22 Aug.2018. Drinking water was provided free of charge, access to water must never be used as means for discrimination or as a disciplinary measure. During site tour it was noted that working environment with respect to lighting of the factory was acceptable. Firefighting equipment were provided and maintained through regular checks. Evacuation plans were posted inside plant and emergency lights were installed at all of the designated places of the production floor and staircase. The factory had 3 trained first aid personnel. There was a medical agreement with a local hospital by the management for the workers. First aid kits were provided in case if it was required by any employee in-side the production floor. Sufficient number of toilets were provided separately for male and female workers, the auditee makes sure that workers are allowed to use toilets in a way that is respectful towards them. the procedures enable workers to report immediately to their supervisor any situation which may present a serious danger to life or health. Both accidents and near-misses are reported. The right of workers to remove themselves from imminent danger without seeking permission. No any fire drill was occurred during the audit day(s). There was no zero tolerance project be found on the scene about "occupational health and safety". This follow-up audit conducted on 11 Dec 2018: PA 7.17 The inspection reports of three pressure gages were within the valid period. N/A note: During the management and workers interview, it was noted the following: 7.23 There was no transportation provided by the facility to workers. 7.24 The factory did not provide dormitory for employees. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation:

工厂实施有效安全管理。工厂建立了健康安全管理程序文件和执行手册。岗位风险评估, 健康安全培训, 消防和疏散演习, 消防器材点检等相关记录均提供并进行了查阅。在生产现场发现工厂厂房结构安全, 无明显缺陷。生产车间干净整洁。有足够的安全出口且进行了标识。在现场安装了火警警报铃, 最后一次消防演习在2018年8月22日进行。现场有免费的饮用水, 从不将用水作为歧视或惩戒措施。工厂给员工免费提供了必须的劳保用品, 消防设施齐全, 消防逃生平面图有张贴在现场, 在车间和楼梯间必要的位置均安装了应急灯。工厂共有3名合格的急救人员, 并与附近医院签订了医疗急救协议。现场有足够数量的男女厕所, 被审核方确保以尊重工人的方式准予工人使用洗手间。被审核方有合适的体系, 以便工人能立即向其主管汇报任何严重危害人们生命或健康的情形。工人有权在迫切危险发生时无需批准离开。审核期间没有发生任何消防演习。现场没有在职业健康安全方面发现零容忍项目。2018年12月11日跟进审核结果: PA 7.17 三个压力表的检验报告在有效期内。备注: 根据管理层和员工的访谈: 7.23工厂没有提供接送服务给员工。7.24工厂没有给员工提供宿舍。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距:

- 7.1 -** The result of follow-up audit on 11 Dec 2018: open 1. It was noted that the factory's health and safety management system needs to be improved, there were some problems in the following terms. 2. It was noted that the auditee failed to provide the updated list or information of law and legal requirements. For example: "PRC labour contract law", "PRC Cleaner Production Promotion Law". 3. It was noted that the auditee did not provide occupational health examination at time of on position to workers who were exposed to hazardous work environment, such as workplace hazards related to use of chemicals by phosphating workers. The auditee only provided occupational health examination in service for the relevant workers. In accordance with Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2002) Amendment (2011), Article 36.
2018年12月11日跟进审核结果: 未关闭。1. 工厂的健康安全管理体系有待改进, 在以下条款出现了问题。2. 工厂没有提供最新的健康安全法律收集。例如: "中华人民共和国劳动合同法", "中华人民共和国清洁生产促进法"。3. 工厂没有给长期接触职业危害的员工(例如磷化车间接触化学品的员工)提供在岗职业健康检查。
- 7.6 -** The result of follow-up audit on 11 Dec 2018: open It was noted that one observed seasoning worker exposed to the noise were not wearing earplugs, and two blow workers did not wear masks properly. In accordance with PRC Safety Manufacturing Law article 42.
2018年12月11日跟进审核结果: 未关闭。发现一名暴露在噪声中的调料员工没有佩戴耳塞, 两名吹塑工人没有正确配戴口罩。
- 7.7 -** The result of follow-up audit on 11 Dec 2018: open It was noted that two barrel of cutting fluid stored in the workshop was not provided with secondary container. In accordance with Regulation for Safety of Dangerous Chemical article 20.
2018年12月11日跟进审核结果: 未关闭。发现两桶放置在车间的切割液没有配备二次容器。
- 7.9 -** The result of follow-up audit on 11 Dec 2018: open It was noted that the auditee had not posted the PPE warning sign (caution of noise, caution of arc) at the needed area. In accordance with People's Republic of China on the Prevention and Control of Occupational Diseases Article 25. New finding on 11 Dec 2018: It was noted that the drinking water & rice steaming box device were missing warning sign of scald.
2018年12月11日跟进审核结果: 未关闭。工厂没有在需要的区域张贴佩戴PPE的警示标语(小心噪声, 小心弧光)。2018年12月11日新问题: 饮水设施和蒸饭箱旁没有张贴防烫伤标示。
- 7.13 -** New finding on 11 Dec 2018: It was noted that the factory was using ordinary fluorescent lighting in raw materials & finished goods warehouse. (the Rules Concerning Warehouse Safety and Fire Control, Article 38)
2018年12月11日新问题: 工厂的原料和成品仓库内使用的是普通的荧光灯。
- 7.17 -** New finding on 11 Dec 2018: It was noted that no zeigeranschlag was equipped to about 20% sewing machines. (Safety Manufacturing Law article 29)
2018年12月11日新问题: 大约20%的缝纫机没有安装挡针器。
- 7.21 -** New finding on 11 Dec 2018: 1. It was noted that the food samples from canteen were not retained for 48 hours for the sake of sample test if needed. (, article 36.) 2. It was noted that the kitchen workers did not wear hat or mask when preparing the meal.
2018年12月11日新问题: 1. 工厂餐厅的食品没有留样48小时以备需要时作为样品检验。不符合《餐饮服务食品安全操作规范》第36条, 也即是国食药监食[2011]395号文件。2. 厨房在准备饭菜时没有配戴帽子及口罩。
- 7.22 -** The result of follow-up audit on 11 Dec 2018: open It was noted that no basic supplies, such as toilet paper or soap, were available in the toilets.
2018年12月11日跟进审核结果: 未关闭。发现工厂车间的卫生间没有提供基本备品如厕纸肥皂。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A

Deadline date:11/03/2018

Good practices

None

Areas of improvement

The rating of 7.23 and 7.24 were N/A, because no transportation or dormitory was provided. A safe and hygienic working environment was provided. Ventilation; temperature and lighting were adequate for the production processes. Mr. Zhang Ming Xiang/Admin Manager is appointed as Health & Safety Manager for the site. Workers had free access to clean toilet facilities and to potable water. For the fire safety section, there were at least 2 exits from each work area and these were clearly marked. Firefighting equipment was adequate and checks were up-to-date. Auditors found that fire extinguishers, fire alarm and fire hydrant could work properly. Workers had received regular and recorded Health & Safety training, and such trainings were repeated for new or reassigned workers. Based on satisfactory evidence, the main auditee partially respects this principle because:

7.23和7.24的评分为不适用, 因为工厂没有提供交通和宿舍。工厂提供了一个安全, 卫生的工作环境。生产车间有着充足的通风, 温度和照明。行政经理张明祥先生被任命为安全健康的总负责人。工厂提供了饮用水和厕所设备。消防方面, 每个生产车间和楼层有至少2个出口, 并且有清晰的出口标志。消防设备充足并且有定期的检验。消防设备例如灭火器, 消防栓和警铃能够正常工作, 工厂为新进员工和转岗员工提供了安全健康方面的培训。基于满意的证据, 被审核方部分满足条款:

- 7.1 -** Through document review, site observation, management, worker representative and workers' interview, It was noted that the auditee did not provide occupational health examination at time of off position to workers who were exposed to hazardous work environment, such as workplace hazards related to use of chemicals by phosphating workers. The auditee only provided occupational health examination in service for the relevant workers. In accordance with Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2002) Amendment (2011), Article 36.
通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 发现工厂没有给长期接触职业危害的员工(例如磷化车间接触化学品的员工)提供离岗职业健康检查。
- 7.6 -** Through site observation, management, worker representative and workers' interview, it was noted that three observed assembling workers exposed to the noise were not wearing earplugs. In accordance with PRC Safety Manufacturing Law article 42.
通过现场观察, 管理者, 员工代表和员工访谈, 审核发现三名暴露在噪声中的装配员工没有佩戴耳塞。
- 7.7 -** Through site observation, management, worker representative and workers' interview, it was noted that the one vat of machine oil stored in the workshop was not provided with secondary container. In accordance with Regulation for Safety of Dangerous Chemical article 20.
通过现场观察, 管理者, 员工代表和员工访谈, 审核发现一大桶放置在车间的机油没有配备二次容器。
- 7.9 -** Through site observation, management, worker representative and workers' interview, it was noted that the auditee had not posted the PPE warning sign(caution of noise, caution of arc) at the needed area. In accordance with People's Republic of China on the Prevention and Control of Occupational Diseases Article 25.
通过现场观察, 管理者, 员工代表和员工访谈, 工厂没有在有需要的区域张贴佩戴PPE的警示标语(小心噪声, 小心弧光)。
- 7.17 -** Through document review, site observation, management, worker representative and workers' interview, it was noted that the inspection reports of three pressure gages were expired on September 14, 2017. In accordance with Special Equipment Safety Law of PRC article 40.
通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 审核发现3个压力表的检验报告于2017年9月14日过期。
- 7.22 -** Through site observation, management, worker representative and workers' interview, it was noted that no basic supplies, such as toilet paper or soap, were available in the toilets.
通过现场观察, 管理者, 员工代表和员工访谈, 审核发现工厂车间的卫生间没有提供基本备品如厕纸肥皂。

Remarks from Auditee

agreed with the auditor and will correct the finding as soon as possible

Performance Area 8 : No Child Labour

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A

Deadline date:

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

There was no finding for this PA in the last audit, so not rated for it in this audit.
在上次审计中这个章节没有发现问题, 所以这次审计中没有对其进行评级。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A

Deadline date:

Good practices

None

Areas of improvement

The factory had established formal procedure that clearly stated not recruiting of child labour that was less than 16 years old. HR department was responsible for checking applicants' ID badge to cross check their actual ages. All workers personnel files including ID copies were kept for reviews. The youngest worker in this factory was 20 years old.
工厂已经制定了禁止使用童工的程序, 16岁以下的童工不得招聘。工厂人事部门在招聘过程中通过验证身份证来核实员工的年龄。所有员工的人事档案包括身份证复印件都得以被保留。工厂目前最小年龄的员工是20岁。

Remarks from Auditee

Performance Area 9 : Special protection for young workers	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: There was no finding for this PA in the last audit, so not rated for it in this audit. 在上次审计中这个章节没有发现问题, 所以这次审计中没有对其进行评级。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The auditee developed policies and procedures how to protect the workers between 16 years and 18 years. There was no young worker in this factory. The youngest worker in this factory was 20 years old. 工厂建立了关于如何保护16至18岁的未成年人的政策和程序。工厂没有使用未成年工。最小年龄的员工是20岁。	
<u>Remarks from Auditee</u>	
Performance Area 10 : No Precarious Employment	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A	Deadline date:10/12/2019
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: Based on employees interview and document review, it was noted that the auditee signed labor contracts with all employees. The labor contracts were written in local language and the items complied with most legal requirements. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation: 通过员工访谈及文件审核, 被审核方跟员工已经签订了劳动合同, 合同使用当地语言且条款符合大部分法规要求。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距: 10.3 - The result of follow-up audit on 11 Dec 2018: open It was noted that occupational disease might result in the work process of some employees in the factory (e.g. the noise in the punching section). However, the facts, harmful effects, consequences, protective measures and necessary treatment of occupational diseases were not indicated in their employment contracts. In accordance with Article 34 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases. 2018年12月11日跟进审核结果:未关闭。发现工厂某些工序的部分员工可能会导致职业病(例如接触金工车间的噪声)。然而, 职业病的有害后果, 影响, 防护措施和必要的治疗在劳动合同中没有记录。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:11/03/2018
<u>Good practices</u> None	
<u>Areas of improvement</u> The auditee signed the contract with all workers and provided one set of labor contract to each worker. The interviewed employees stated that they received one copy of the contract. Based on satisfactory evidence, the main auditee partially respects this principle because: 工厂和所有员工都签订了劳动合同并且提供了副本。被访谈的员工都表示他们收到了合同副本。基于满意的证据, 被审核方部分满足条款: 10.3 - Through document review, site observation, management, worker representative and workers' interview, it was noted that occupational disease might result in the work process of some employees in the factory (e.g. the noise in the punching section). However, the facts, harmful effects, consequences, protective measures and necessary treatment of occupational diseases were not indicated in their employment contracts. In accordance with Article 34 Law of the People's Republic of China on the Prevention and Treatment of Occupational Diseases. 通过文件审核, 现场观察, 管理者, 员工代表和员工访谈, 审核发现工厂某些工序的部分员工可能会导致职业病(例如接触金工车间的噪声)。然而, 职业病的有害后果, 影响, 防护措施和必要的治疗在劳动合同中没有记录。	
<u>Remarks from Auditee</u> agreed with the auditor and will correct the finding as soon as possible	

Performance Area 11 : No Bonded Labour	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A	Deadline date:
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: There was no finding for this PA in the last audit, so not rated for it in this audit. 在上次审计中这个章节没有发现问题, 所以这次审计中没有对其进行评级。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:
<u>Good practices</u> None	
<u>Areas of improvement</u> The factory has a policy which prohibits bonded and forced labour. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice. The terms and conditions of employment in the handbook state that the workers are free to leave the workplace outside of their working hours. 工厂已经建立了禁止强迫劳动的程序文件。雇主不得扣押工人的证件, 工人在给与合理的通知期限之后, 可以自由的离开工厂。员工手册规定, 工人在工作时间之外可以自由离开工厂。	
Remarks from Auditee	
Performance Area 12 : Protection of the Environment	
1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: B	Deadline date:10/12/2019
GOOD PRACTICES: None	
AREAS OF IMPROVEMENT: The auditee has mechanisms in place to promote water conservation and water waste reduction. The facility had established environmental protection management procedure. The auditee has a good understanding of the environmental impacts of its business activities. Supplier control policy regarding environmental protection was defined and implemented. The facility has set up procedures to improve the environmental and work condition according to BSCI code of conduct. The factory used tap water supplied by local water plant which was under the supervision of local government. However, based on satisfactory evidence, the main auditee did not fully respect this principle, gaps were identified in implementation: 工厂使用市政自来水, 被审核方有适当的机制来提高节水和减少废水的能力。工厂建立了环境保护相关管理制度以及供应商环境保护管理制度, 审核方对商业活动的环境影响有一个较好的理解。同时根据BSCI行为准则制定了改进环境和工作条件的规定。但是, 基于令人满意的证据, 主要审核方没有完全尊重这个原则, 在执行中存在以下差距: 12.3 - New finding on 11 Dec 2018: It was noted that there was no inspection report available to prove the valid emission of the waste air discharged from the kitchen. (the PRC Law of Prevention and Treatment of Air Pollution article 36) 2018年12月11日新问题: 工厂未能提供废油烟气检测报告以证明厨房的废气排放已达标。 12.5 - The result of follow-up audit on 11 Dec 2018: open It was noted that the factory had not mechanism in place to promote water conservation and water waste reduction. 2018年12月11日跟进审核结果:未关闭。发现工厂没有适当的机制来提高节水和减少废水的能力。	
Remarks from Auditee:	
Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A	Deadline date:11/03/2018
<u>Good practices</u> None	
<u>Areas of improvement</u> The auditee had set up relevant policy regarding the environment protection. Based on satisfactory evidence, the main auditee partially respects this principle because: 工厂已经建立了环境保护相关的政策。基于满意的证据, 被审核方部分满足条款: 12.5 - Through document review, site observation, management interview, it was noted that the factory had not mechanism in place to promote water conservation and water waste reduction. 通过文件审核, 现场观察, 管理者访谈, 审核发现工厂没有适当的机制来提高节水和减少废水的能力。	
Remarks from Auditee	
agreed with the auditor and will correct the finding as soon as possible	

Performance Area 13 : Ethical Business Behaviour

1- Followup Audit [Audit Id - 139811] Audit Date: 11/12/2018 PA Score: A

Deadline date:

GOOD PRACTICES:

None

AREAS OF IMPROVEMENT:

The auditee set up several policies to prohibit the corruption in purchase and other business activities. Ethical behavior in business starts with the way in which enterprises run their operations. There was no zero tolerance project be found on the scene about "ethical business behavior". The auditee has set up appropriate measures to ensure and demonstrate no corruption, extortion, embezzlement, bribery, falsified information or misrepresentation in the supply chain. The auditee identified the situations and activities where acts of corruption, extortion or bribery were most likely to occur in its context and policies / procedures against any act of corruption and takes active measures to prevent and remediate them. This follow-up audit conducted on 11 Dec 2018: PA13.1 The auditee had established the procedure for investigation and discouragement of unethical behavior.

受审核方建立了政策来防止采购及其他商业行为中的腐败。从公司经营业务开始公司道德的商业行为。没有在“道德商业行为”方面发现零容忍的情况。工厂建立了合适的管理措施来确保及明确在供应链中不能存在行贿索贿、挪用盗用公款、贪腐、提供虚假资料、虚报等行为。在管理制度中明确了在哪些方面可能存在贪腐、挪用公款或者贿赂等行为以及相应的预防管理措施。2018年12月11日跟进审核结果:PA13.1 被审核方有建立调查和防止不道德商业行为的程序。

Remarks from Auditee:

Full Audit [Audit Id - 115956] Audit Date: 10/01/2018 PA Score: A

Deadline date:11/03/2018

Good practices

None

Areas of improvement

The auditee conducted risk assessment of this part. Auditor reviewed the payroll and attendance records provided by factory management, cross checked these records with other time related records such as inspection records, warehouse records, production records, and interviewed 25 sample workers, to corroborate the information in the payroll and attendance records. No inconsistency records were noted between the records reviewed and employee interview results. Based on satisfactory evidence, the main auditee partially respects this principle because:

工厂已进行此部分的风险评估。审核员审核了工资表和考勤记录, 工厂也提供其它一些记录, 如检查记录, 仓库进出库记录, 生产日报表和25员工进行了访谈, 没有发现不一致的记录。基于满意的证据, 被审核方部分满足条款:

- 13.1 -** Through document review, management, worker representative and workers' interview, it was noted that the auditee did not establish the procedure for investigation and discouragement of unethical behavior.
通过文件审核, 管理者, 员工代表和员工访谈, 审核发现被审核方没有建立调查和防止不道德商业行为的程序。

Remarks from Auditee

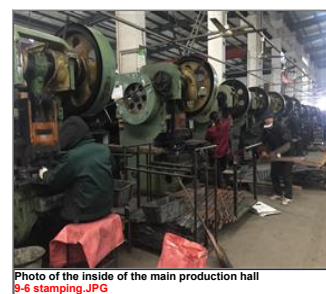
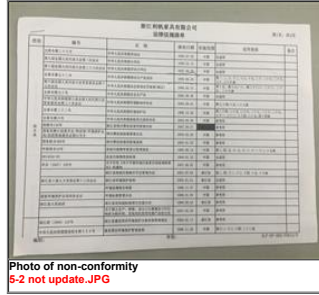
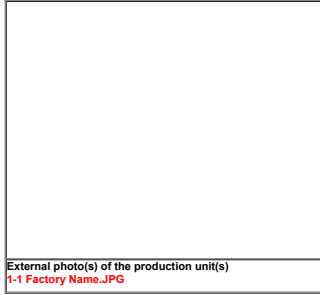
agreed with the auditor and will correct the finding as soon as possible

Summary



Audit Type	Date	Audit Id	PA1	PA2	PA3	PA4	PA5	PA6	PA7	PA8	PA9	PA10	PA11	PA12	PA13	Overall Rating
Follow-up Audit	11/12/2018	139811	D	A	A	A	A	D	B	A	A	A	A	B	A	C
Full Audit	10/01/2018	115956	D	C	A	A	B	D	A	A	A	A	A	A	A	C

Producer Photos



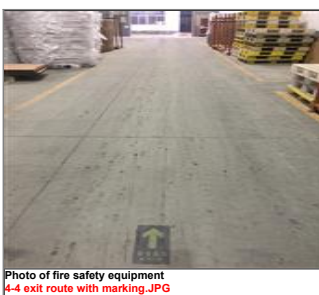
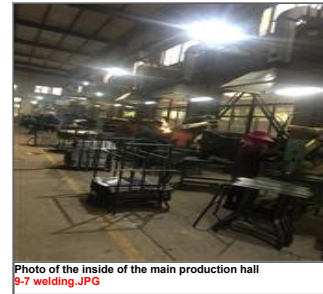




Photo of fire safety equipment
4-5 fire evacuation plan.JPG



Photo of the inside of the main production hall
9-1 warehouse for raw.JPG



Photo of the sanitary facilities
13-1 Potable water.JPG



Photo of fire safety equipment
4-6 fire hydrant.JPG



Photo of the inside of the main production hall
9-10 assembling.JPG



Photo of the sanitary facilities
13-2 The sanitary facilities.JPG



Photo of non-conformity
5-1 The maximum monthly work time is 94 hours.JPG



Photo of the inside of the main production hall
9-11 packing.JPG



Photo of the code of conduct on display
7 Coc on display.JPG



Photo of non-conformity
5-10 did not wear hat or mask.JPG



Filing No.: CRC-HDPE-2009-003

声明 – 产品符合性

STATEMENT of CONFORMITY

[日期 DATE] **2009-1-8**

[产品/牌号 PRODUCT/GRADE] **PE / HD5502FA**

[公司 COMPANY] 杭州萧山东南塑料包装有限公司

[联系方式 CONTACT] 庄劲凤 **TEL:0571-57121122**

[关键词 KEY WORDS] 邻苯二甲酸盐 **Phthalates**

尊敬的客户 Dear Customer,

此信函是关于贵司对上海赛科石油化工有限公司所生产的聚乙烯产品（**牌号：HD5502FA**）是否含有 邻苯二甲酸盐 的答复。

This is in response to your request for information concerning the compliance of **Phthalates** for **HDPE <Grade HD5502FA>**, manufactured by Shanghai SECCO Petrochemical Co. Ltd.

赛科在该产品（**牌号：HD5502FA**）生产过程中，及所选的原料和添加剂，均未有意引入邻苯二甲酸盐。

Please be advised that, to the best of our knowledge, the substance of **Phthalates** are not used, either as additives or raw materials in the manufacture of the products (**Grade: _____**
HD5502FA)

若有任何疑问，欢迎和我联系或联系赛科当地的销售代表。此致，

If you have any further questions, please feel free to contact me or contact our local sales representative.

商祺 Sincerely,

徐靖峰

SECCO Petrochemical Co. Ltd

HSSE Q Engineer

2009-1-8