

Monitored Party ZHANGJIAGANG DAOFU KNITTING CO.,LTD	amfori ID 156-013395-000	Address No.158, Xiyang Road, Ouqiao Village, Tangqiao Town, Zhangjiagang City, 215611 Suzhou, Jiangsu Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner TUV Rheinland
Monitoring Start Date 04/12/2024	Closing Meeting Finished Date 06/12/2024	Submission Date 10/12/2024
Expiration Date 10/12/2025	Announcement Type Semi Announced	
Site ZHANGJIAGANG DAOFU KNITTING CO.,LTD	Site amfori ID 156-013395-001	

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OVERALL RATING



SECTION RATING

PA1: Social Management System	C	
PA 2: Workers Involvement and Protection	B	
PA 3: The Rights of Freedom of Association and Collective Bargaining	A	
PA 4: No Discrimination, Violence or Harassment	A	
PA 5: Fair Remuneration	B	
PA 6: Decent Working Hours	D	

PA 7: Occupational Health and Safety	A	
PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Amanda Shi; APSCA membership number: CSCA 21701853

Monitoring partner name: TUV Rheinland;

Audit schedule details: The audit is planned for 1 auditor x 1 day

Announcement Type: Semi -Announced

Business partner information: The auditee was located at No.158, Xiyang Road, Ouqiao Village, Tangqiao Town, Zhangjiagang City, Suzhou, China (中国苏州市张家港市塘桥镇欧桥村西阳路158号). The facility was founded on March 23, 2016. The main products were knitted products (hats, scarves, headbands, wrist bands), and the main processes were knitting, stitching, ironing, inspection and packing in the factory. There was no sub-contractor used by the factory.

Remark: The audit address provided by the auditee was No.158, Xiyang Road, Ouqiao Village, Tangqiao Town, Zhangjiagang City, 215611 Suzhou, China. However, the registered address in the business license was No. 2 & 3 Building, Xiyang Road, Ouqiao Village, Tangqiao Town, Zhangjiagang City, SuZhou City, Jiangsu Province. Based on management interview, lease agreement reviewing and factory tour, these two address referred to the same physical location.

Audited location information: The audited factory rented Building #2 and #3, which were one 2-storey building (1F as packing, inspection workshop and warehouse, 2F as knitting workshop and office) and one flat (stitching, ironing workshop) as production, warehouse and office from Zhangjiagang Tangqiao Town Miaoqiao xx Knitting Factory. The audited factory provided leasing agreement for review. There were four other factories in the same address, their buildings were all rented from the landlord, and the buildings were separated; their products were different from the audited factory, and they produced independently; workers were separated managed which was confirmed by site observation, management and workers' interview. This audit only covered the rented area of the audited factory. No dormitory, no canteen and kitchen were provided for employees. There was no obvious peak season in the factory. The total occupied areas were 4800 square meters.

Operating shifts and hours: The working hours were 8:00-11:00, 12:00-17:00 for workers. Regular overtime was conducted for from 17:30-18:30 or 17:30-19:30 according to production requirement. Normal working hours were 8 hours per day and 5 days per week. The attendance records from November 1, 2023 to the audit day were reviewed. 8 samples were randomly selected from October 2024, August 2024 and June 2024. Through reviewing the samples, maximum overtime was 2 hours per day and 14 hours per week. Saturday was arranged as overtime, Sunday was guaranteed as the rest day. The factory guaranteed at least one day rest per week.

Time recording system: Finger printing attendance machine

Salary payment details: The local minimum wage standard set as RMB 2280 per month, equivalent to RMB 13.1 per hour since August 1, 2021 to December 31, 2023. The local minimum wage standard set as RMB 2490 per month, equivalent to RMB 14.31 per hour since January 1, 2024. Based on 8 sampled payrolls from November 2023 to October 2024, it was observed that wage was calculated by hourly rate and the minimum hourly wage was RMB 14.37 per hour, the payment calculation period was natural month, the wage was paid by cash on 25th of the following month with pay slip, no worker earned salary below minimum wage, and no any fine or illegal deduction in the wage. The wage included basic wage plus overtime wage. The overtime wage was paid at rate of 150%, 200% and 300% for overtime in weekdays, weekends and holidays.

Worker number information: There were total 45 employees (36 females and 9 males) in the factory currently, including 6 non-production employees (2M+4F) and 39 workers (7M+32F). There were 11 domestic migrant worker (4M+7F), no foreign migrant workers. There was no young worker, pregnant worker, seasonal workers, temporary worker, disabled worker, home-based worker, interns, apprentices, contractor worker. All workers were hired by the factory directly.

Good practices: The short break of 15 minutes were provided for workers in each half of the shift

Worker organization details: There was no labor union. One worker representative was elected in June 2023.

Circumstances: During the audit, factory management was cooperative and they accepted all the findings on the closing meeting. There was no special circumstance during the audit. Summary of findings: The findings were found in PA 1, 2, 5,6, 7 and 12

PA 1 Insufficient management system implementation/Insufficient implementation of capacity plan

PA 2 No long term goal defined for workers' protection

PA5 Renumeration below BNW/Insufficient social insurance

PA 6 Excessive monthly overtime

PA 7 No occupational health check/No fire safety report for the building/No building safety report for the building/Goods piled against the wall/ Insufficient machine safety device

PA 12 No boundary noise testing

#LivingWage:

- 1). No anker wage available for the producers location, so we used the data provided by auditing company.
- 2). The calculation methodology refers to anker living wage structure.
- 3). The data comes from the local bureau of statistics for the current year.

Attachment:

1. The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit.
2. There was no contractor, labor agency, government waiver, or collective bargaining, which made the corresponding documents not applicable.

SITE DETAILS

Site
**ZHANGJIAGANG DAOFU
KNITTING CO.,LTD**

Site amfori ID
156-013395-001

GICS Classification

Sector Consumer Discretionary	Industry Group Consumer Durables & Apparel	Industry Textiles, Apparel & Luxury Goods
Sub Industry Apparel, Accessories & Luxury Goods		

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	45	Workers
Legal minimum wage in local currency	2,490	Monthly
Lowest wage paid for regular work at the site	2,500	Monthly
Calculated living wage in local currency	4,543	Monthly
Total sample	8	Workers

Other Metrics

Male workers	9	Workers
Female workers	36	Workers
Non-binary workers	0	Workers
Permanent workers - Male	9	Workers
Permanent workers - Female	36	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	1	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	4	Workers
Domestic migrant workers - Female	7	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	9	Workers
Workers hired directly - Female	36	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	1	Workers
Sample - Female	7	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 1.1 Is there satisfactory evidence that the auditee has set up an effective management system to implement the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>This question was rated as partially. Based on factory tour, document review, worker and management interview, CSR management system was not completed in implementation. During this audit, it was noted that working hours and health and safety performance could not meet local law requirement; through document review, the auditee did not analyze root cause and take corrective measure for these findings; through management interview, management said they established related policies following amfori BSCI requirement, but partial issues still needed to spend more time and more cost to improve. Reference amfori BSCI system manual.</p>	<p>这个问题被评为部分符合。通过现场查看、文件查阅、员工和管理人员访谈，社会责任管理体系在执行上仍然不完善。在此次审核中发现被审核方的工作时间和健康安全表现不能满足当地法规的要求；通过文件查阅，被审核方也没有进行原因分析和制定改善计划；通过管理者访谈，管理者说他们已经依据amfori BSCI的要求建立了相关的制度，但是部分问题依然需要更多的时间和成本来改善。参考amfori BSCI系统手册。</p>

Question: 1.4 Is there satisfactory evidence that the auditee's workforce capacity is properly organised to meet the expectations of the delivery order and/or contracts?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>This question was rated as partially. Based on document review, worker and management interview, The auditee had established cost calculation and control procedure, but failed to effectively control workers working hours led to all workers' monthly overtime work exceeded 36 hours in all months. The management stated that the capacity planning always change due to order so sometimes partial workers were required to work overtime to fulfill the order delivering date. Reference amfori BSCI system Manual.</p>	<p>这个问题被评为部分符合。通过文件查阅、员工和管理人员访谈，被审核方有建立成本核算的程序文件，但是没有有效的控制工人的工作时间，以至于所有工人所有月加班工作超过36小时。管理层表示产能计划要经常随订单调整，无法精确计划，所以有时部分工人需要加班工作以满足订单的出货需求。参考amfori BSCI系统手册。</p>



PA 2: Workers Involvement and Protection

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
Finding	
The auditee didn't comply this principle, because based on management interview, document review, the facility had not defined long term goals to protect workers according to the amfori BSCI Code of Conduct. The management explained they were busy with the production this year. This violated the requirements in the amfori BSCI system manual.	被审核方没有遵守该原则，因为基于管理层访谈、文件审查，工厂没有依据amfori BSCI的行为守则来建立保护工人的长期目标。管理人员解释他们这一年都在忙于生产。这违反了 amfori BSCI 系统手册中的要求。

PA 5: Fair Remuneration

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 5.4 Is there satisfactory evidence that the auditee provides sufficient remuneration that allows workers to meet a decent standard of living?

ENGLISH	LOCAL LANGUAGE
Finding	
This question was rated as No, because based on management and worker interview, document review, the factory did not collect local living costs data to calculate the local living wage. The facility was unable to identify the possible gap between actual remuneration and living wages, and took potential action to fill the gap. Based on the sampled payroll records, the remuneration of all 8 sampled workers in October 2024, August 2024 and June 2024 were lower than the local living wage of RMB 4543 per month, the maximum gap was RMB 1243. This violated the requirements in the amfori BSCI system manual.	这个问题被评为不符合，因为基于管理层和员工访谈、文件审查，工厂未收集当地的生活成本的数据来计算当地生活水平工资。工厂不能发现生活水平工资与其实际支付工资的差距，并致力于采取措施将差距补足。根据抽样的工资记录，所有8名抽样员工在2024年10月，2024年8月和2024年6月的报酬低于当地的生活工资人民币4543元，最大差距为人民币1243元。这违反了 amfori BSCI 系统手册中的要求。

Question: 5.5 Is there satisfactory evidence that the auditee provides workers with the social benefits that are legally granted without negative impact on their pay, level of seniority, position, or promotion prospects?

ENGLISH	LOCAL LANGUAGE
Finding	
This question was rated as Partially. Based on document review, worker and management interview, insufficient social insurance was detected. There were total 45 employees with 8 retired age workers. No new employee was hired	这个问题被评为部分符合。通过文件查阅、员工和管理层访谈，发现社保不足。工厂有45名员工，有8名退休返聘员工在职。2024年10月份社保申报期后没有招聘新员工。总共有37名员工应该依法参加5项社会保险。但是其中有22名员工没有购买养

Finding

after the social insurance application date of October 2024. Total 37 employees were eligible to receive five types of social insurances according to the law. However, 22 employees were not provided with retirement, medical, maternity, unemployment and work-related injury social insurances. Social insurance benefit was communicated with the employees upon hiring per testimonies of interviewees and the facility management. Some interviewed workers stated that they did not want to participate in social insurance as they had rural insurance at home. The facility management did not collect the related rural insurance records. Reference law: Social Insurance Law of the People's Republic of China; Article 10, Article 23, Article 33, Article 44, Article 53. Remark: The factory provided the commercial insurances to 22 employees without social insurance and 8 retired age workers. The valid date was from October 30, 2024 to October 29, 2025.

老，医疗，生育，失业和工伤保险。根据员工和管理层汇报社保福利有在员工入职的时候和员工沟通。部分受访员工表示他们不愿意参加社保，因为他们家里有农保。工厂没有收集农保的相关记录。参考法律法规：中华人民共和国社会保险法，第10条，23条，33条，44条和53条。备注：工厂为22名没有社保的员工和8名超龄员工提供了商业工伤险，有效期为2024年10月30日至2025年10月29日。

PA 6: Decent Working Hours

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 6.2 CRUCIAL: Is there satisfactory evidence that the auditee request of overtime is in line with the requirements of the amfori BSCI Code of Conduct?

ENGLISH

LOCAL LANGUAGE

Finding

This question is rated as No because the monthly overtime of all months of last one year exceeded 36 hours. Based on management and worker interviews and document review it was identified that: all 8 sampled workers' monthly overtime in October 2024 was 61 hours; all 8 sampled workers' monthly overtime in August 2024 was 64 hours; all 8 sampled workers' monthly overtime in June 2024 was 54 hours. Facility did not have an effective overtime management control system. The facility management declared that production department was not aware of overtime management and controlling plan. When they arranged overtime, working hours always based on production tasks. Facility did not have a system to alert workers whose monthly overtime exceed 36 hours or would reach 36 hours. Workers said overtime work based on factory's production plan and they were glad to

此问题评级为不符合，因为月加班超过36小时在过去12个月的所有月份都有发生。根据管理层和员工访谈以及文件审核显示：抽取8名样本员工在2024年10月的月加班时间为61小时；抽取的8名样本员工在2024年8月的月加班时间为64小时；抽取的8名样本员工在2024年6月的月加班时间为54小时。企业没有一个有效的加班管控系统。企业管理层解释生产部门不了解加班管控计划，在安排加班时按生产任务决定加班时数。企业也没有一个预警系统来警告月加班时间达到36小时或将要到达36小时的员工。员工说加班取决于工厂的生产计划，但是他们愿意加班多挣钱。参考法规：《中华人民共和国劳动法》第41条。备注：8名样本员工在2024年11月1日至2024年11月30日的加班时间为51小时。8名样本员工在2024年12月1日至2024年12月4日的加班时间为1小时。

Finding

take overtime for making money. Reference law: PRC Labour Law article 41
Remark: The overtime hours of 8 samples from November 1, 2024 to November 30, 2024 were 51 hours. The overtime hours of 8 samples from December 1, 2024 to December 4, 2024 were 1 hour.

PA 7: Occupational Health and Safety

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 7.1 Is there satisfactory evidence that the auditee observes occupational health and safety regulations applicable for its activities?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially complied this principle, because based on management and worker interview, document review and onsite observation, the facility did not provide pre-job, on-service and post service occupational health examinations to employees contacting occupational hazardous factor of noise and dust in the knitting workshop. The facility management stated that they needed more time to improve this due to cost control. The hazardous factor testing has been conducted on November 27, 2024. Reference Law: the People's Republic of China on the Prevention and Control of Occupational Diseases, Article 35.

被审核方部分遵守该原则，因为基于管理层和员工访谈、文件审查及现场观察，工厂没有给织造车间接触噪音粉尘的职业危害因素的员工提供岗前、岗中和离岗的职业病体检。工厂管理表示由于费用控制，他们需要更多时间来改善此处。工厂已于2024年11月27日进行了职业危害因素监测。参考法律法规：中华人民共和国职业病防治法 第三十五条。

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH

LOCAL LANGUAGE

Finding

The auditee partially complied this principle, because based on management interview, document review and onsite observation, the facility did not have any Building Fire Safety proof or report and Building Construction Safety Inspection Report of the used one 2-storey building and one flat building. The construction area of the buildings were 4200 square meters (one 2-storey building) and 600 square meters (one flat). They

被审核方部分遵守该原则，因为基于管理层访谈、文件审查及现场观察，工厂没有所用的1栋2层建筑和一幢平房建筑的任何消防安全证明或者报告和竣工验收报告。1栋2层建筑建筑面积约4200平方米，一幢平房面积约600平方米，于2008年竣工。建筑看起来坚固耐用，没有明显裂缝。工厂使用的区域有配备足够的消防设施如灭火器，消防栓，火警铃。相关法律法规：中华人民共和国消防法第十三条&中华人民共和国建筑法第六十一条。

Finding	
<p>were completed in 2008. The buildings looked strong and durable without obvious crack. The used areas by the auditee were installed with sufficient firefighting equipment, like fire extinguishers, fire hydrant and fire alarm.</p> <p>Reference law: PRC Fire Prevention Law Article 13 & Construction Law of the People's Republic of China, Article 61.</p>	

Question: 7.16 Is there satisfactory evidence that the auditee ensures evacuations plans meet legal requirements and that these plans are posted in relevant places so workers can see and understand them?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially complied this principle based on factory tour, document review, worker and management interview, it seemed that the building and equipment used for production was stable and safe in general. Sufficient firefighting equipment was installed in place and maintained in good conditions at the workplace. However, according to site observation and management interview, it was noted that 50% goods were stored against pillar or wall in the warehouse. The management explained that because of the limited space, it is not possible to fully ensure that the goods are a certain distance from the wall. (Reference law: Rules Concerning Warehouse Safety and Fire Control, Article 18)</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈、文件审查及现场观察，生产所用的建筑和设备总体上是稳定和安全的。工作场所已安装了足够的消防设备并保持良好状态。然而，根据现场观察和管理人员访谈，仓库内50%货物靠柱/墙存放。管理人员解释因为空间有限，无法完全保证货物距离墙体都有一定距离。（参考法律：仓库防火安全管理规划第18条）</p>

Question: 7.17 Is there satisfactory evidence that the auditee ensures adequate safeguards for any machine part, function, or process which may cause injury to workers?

ENGLISH	LOCAL LANGUAGE
Finding	
<p>The auditee partially complied this principle based on factory tour, document review, worker and management interview, there were no needle guards installed for 5 out of total 5 randomly sampled sewing machines in sewing workshop. The management explained they would check the machines condition thoroughly at the end of the next month. Reference law: General rules of design on health and safety of production facility, Article 6.1.2.</p>	<p>被审核方部分遵守该原则，因为基于管理层访谈、文件审查及现场观察，在缝纫车间随机抽查的5台缝纫机中，有5台没有安装护针器；管理层解释说，他们将在下个月月底彻底检查机器的安全状况。参考法律：生产设施健康与安全设计总则第6.1.2条。</p>



PA 12: Protection of the Environment

Site: ZHANGJIAGANG DAOFU KNITTING CO.,LTD | Site amfori ID: 156-013395-001

Question: 12.4 Is there satisfactory evidence that waste is managed in a way that does not lead to the pollution of the environment?

ENGLISH

LOCAL LANGUAGE

Finding

This question was rated as partially. Based on onsite tour, document review, worker and management interview, the factory didn't monitor its noise level from the knitting process to comply with the requirement of local law. The management explained they personally thought the noise range was acceptable. Reference law: Law of the People's Republic of China on Prevention and Control of Pollution from Environmental Noise, Article 23

这个问题被评为部分符合。通过现场审核，文件查阅、员工和管理人员访谈，公司没有监测织造工序产生的噪音以确保其排放符合法律的要求，管理人员解释他们自觉噪音范围是可以接受的。参考法律法规：中华人民共和国环境噪声污染防治法 第23条。