

Monitored Party <b>Top Blue Manufacturing Co., Ltd.</b>	amfori ID <b>156-011874-000</b>	Address <b>NO.99 Songji Industrial Center, Qingong Town, Huai'an District,, 223231 Huai'an City, Jiangsu Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>Intertek</b>
Monitoring Start Date <b>11/08/2025</b>	Closing Meeting Finished Date <b>14/08/2025</b>	Submission Date <b>18/08/2025</b>
Expiration Date <b>18/08/2026</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Top Blue Manufacturing Co., Ltd.</b>	Site amfori ID <b>156-011874-002</b>	

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## OVERALL RATING



## SECTION RATING

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

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

## GENERAL DESCRIPTION

Name of lead auditor: Justin Huang;

APSCA membership number: CSCA21700276

Name of team auditor (if applicable): N/A

Name of observers, translators, trainees, advisors/consultants (if applicable): None

Monitoring partner name: Intertek

Audit schedule details: 1 auditor x 1 day

Announcement Type: Semi Announced

Business partner information: Top Blue Manufacturing Co., Ltd. / 淮安拓蓝户外服饰制造有限公司 (Uniform Code of Social Credit: 91320803MADF7QWG8T) is located at No.99 Song Ji industrial Center, Huai An District, Huai An City, Jiang Su Province, China. This is a limited company. The total land area occupied by the facility is about 7000 square meters. The facility was established in March 2024. The main products manufactured in the facility are hats, the main production processes include cutting, embroidery, knitting, sewing, ironing, inspection, and packaging. The facility has complete production processes and no sub-contractor was used.

Audited location information: The facility consists of one 2-storey building for workshop, warehouse, and canteen, one flat iron house is added to the side of the first floor of the 2-storey building, which is used as kitchen, one 2-storey (partial 3-storey) building for office, workshop, and warehouse. No dormitory was provided by the facility. Building details are as below:

#1. One 2-storey building: embroidery, knitting, warehouse, and canteen;

#2. One flat iron house: kitchen;

#3. One 2-storey (partial 3-storey) building: cutting, sewing, ironing, inspection, packaging, warehouse, and office.

The facility rented above buildings from a local landlord named.

Operating shifts and hours: The attendance records from 1 July 2024 to 11 August 2025 were reviewed at this audit.

Employees regularly worked for 8 hours per day and 5 days per week. The regular working hour for employees was 08:00 to 12:00 and 13:00 to 17:00. There was no obvious peak season in the facility.

Time recording system: Finger print system was used for time keeping.

Salary payment details: The payroll records from July 2024 to June 2025 were reviewed at this audit. Employees' wages were calculated on hourly rated basis. The lowest basic wages were RMB2700 per month, which was higher than the legal requirement. The local minimum wage was RMB 2010 per month equivalent to RMB 11.55 (2010/21.75/8) per hour since 1 January 2024. For overtime wages, 150%, 200%, 300% of basic wages were paid to employees for their overtime hours on normal working days, rest days and public holidays respectively. Employees were paid in cash, the wages would be paid on 25th of each month after the previous wage calculation cycle.

Worker number information:

A total of 46 employees (33 Females and 13 Males) including 35 production workers and 11 non-production staffs were working in the facility. 38 employees were local workers from Guangdong province; the other 8 employees were domestic migrant workers from other provinces.

Good practices: None

Worker organization details: No labor union was established in the facility, but workers committee with 4 worker representatives was available in the facility. The worker representative was elected by all employees freely.

Circumstances: There was no special circumstance during the audit.

Summary of findings:

1.1 The social management system was not implemented effectively.

1.4 The auditee's workforce capacity was not properly organized to meet the expectations of the delivery order and/or

contracts due to the overtime hours exceeding the local law requirement.

2.2 The facility didn't provide collected evidence of last year to demonstrate the compliance status.

5.4 The facility management did not understand the living wage of local area and did not know how to evaluate and calculate the living wage.

5.5 Insufficient social insurance participation.

6.2 The monthly overtime hours exceeded legal limit.

7.1 The facility did not fully comply with the health and safety legal requirement during the audit.

7.11 (1) The facility could not provide fire certificate for one 2-storey building and one 3-storey building for review. (2) The facility could not provide the report of construction completion acceptance for one 2-storey building and one 3-storey building for review.

7.21 The facility did not obtain the Food Operation Permit.

Living wage calculation:

#LivingWage: Anker methodology is used for Living Wage calculation by auditing company.

Remark:

For uploading document:

1) There is no agencies or contractors used by the facility, which makes the agency labour contract and contractor license not applicable.

2) There is no collective bargaining agreement in the facility, which makes the collective bargaining agreement not applicable.

3) There is no any government waiver obtained by the facility, which makes the government waiver not applicable.

4) There is no fire certificate obtained by the facility, which makes the fire certificate not applicable.

5) There is no report of construction completion acceptance obtained by the facility, which makes the report of construction completion acceptance not applicable.

## SITE DETAILS

Site  
**Top Blue Manufacturing Co., Ltd.**

Site amfori ID  
**156-011874-002**

### GICS Classification

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Sector	Industry Group	Industry
<b>Consumer Discretionary</b>	<b>Consumer Durables &amp; Apparel</b>	<b>Textiles, Apparel &amp; Luxury Goods</b>

Sub Industry  
**Textiles**

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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N.A.

### Water Stress Situation

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N.A.

## METRICS

### Key Metrics

Total workforce	46	Workers
Legal minimum wage in local currency	2,010	Monthly
Lowest wage paid for regular work at the site	2,700	Monthly
Calculated living wage in local currency	2,447.35	Monthly
Total sample	8	Workers

### Other Metrics

Male workers	13	Workers
Female workers	33	Workers
Non-binary workers	0	Workers
Permanent workers - Male	13	Workers
Permanent workers - Female	33	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	2	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	4	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	13	Workers
Workers hired directly - Female	33	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: Top Blue Manufacturing Co., Ltd. | Site amfori ID: 156-011874-002

**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
<b>Finding</b>	
<p>1.1 Based on documents review workers interview and site tour, the social management system was not implemented effectively, and some non-compliance findings were detected in Performance Areas of Social Management System and Cascade Effect, Workers Involvement and Protection, Fair Remuneration, Decent Working Hours, and Occupational Health and Safety. For details, please refer to Performance Area 1, 2, 5, 6, and 7 respectively.</p> <p>This question was rated as Partially because most of performance areas were implemented well, only some gaps were found in several PAs.</p> <p>This finding was against amfori BSCI Code of Conduct, Principle on Social Management System and Cascade Effect.</p>	<p>基于文件审核、员工访谈及现场走访，审核员发现企业没有有效执行社会责任管理系统。在供应链管理及级联效应、员工参与和保护、公平报酬、体面工作时间、职业健康安全等绩效领域发现部分问题点。详细分别见绩效领域第1、2、5、6、和7部分。该问题点选Partially, 因为大部分执行领域运行状况良好，只有少数执行领域存在差距。</p> <p>该问题点违反了BSCI行为守则，供应链管理及级联效应。</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
<b>Finding</b>	
<p>1.4 The auditee's workforce capacity was not properly organized to meet the expectations of the delivery order and/or contracts due to the overtime hours exceeding the local law requirement. Please refer to checkpoint 6.2 for details.</p> <p>This question was rated as No because the facility did not have effective process to control overtime hours.</p> <p>This finding was against amfori BSCI Code of Conduct, Principle on Social Management System and Cascade Effect.</p>	<p>受审核方的劳动力没有被正确安排以满足客人订单的期望，因为月加班时间超出了法律的规定，具体参考检查点6.2。</p> <p>该问题点选No，因为企业没有有效的措施控制加班。</p> <p>该问题点违反了BSCI行为守则，供应链管理及级联效应。</p>



## PA 2: Workers Involvement and Protection

Site: Top Blue Manufacturing Co., Ltd. | Site amfori ID: 156-011874-002

**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
<b>Finding</b>	
<p>2.2 The long-term goals were established to protect workers according to the BSCI Code of Conduct and detailed plan was established to achieve the goals, however, the facility didn't provide collected evidence of last year to demonstrate the compliance status.</p> <p>This checkpoint was rated as Partially because of the facility had already established the long-term goals.</p> <p>This finding was against amfori BSCI Code of Conduct, Principle on Workers Involvement and Protection.</p>	<p>企业根据BSCI行为准则定义长期目标来保护员工，制定了具体的计划以实现目标，但未收集上一年的符合证据以显示符合状态。</p> <p>这个检查点选Partially，是因为企业已定义保护员工的长期目标。</p> <p>这个问题不符合amfori BSCI的行为准则之工人参与度和保护的原则。</p>

## PA 5: Fair Remuneration

Site: Top Blue Manufacturing Co., Ltd. | Site amfori ID: 156-011874-002

**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
<b>Finding</b>	
<p>5.4 During management interview, auditor found that the facility management did not understand the living wage of local area and did not know how to evaluate and calculate the living wage.</p> <p>The question was rated as Partially because the basic wages paid by the facility were above the living wages calculated by auditor.</p> <p>This finding was against amfori BSCI Code of Conduct, Principle on Fair Remuneration.</p>	<p>过管理层面谈，审核员发现企业不了解当地的生活工资，不清楚如何评估计算生活工资。</p> <p>该问题点视为部分符合。因为企业支付的基本工资高于审核员计算出的生活工资。</p> <p>该问题点违反了BSCI行为守则，公平报酬。</p>

**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
<b>Finding</b>	
5.5 The social insurance documents of past 12	过去12个月的社保记录有供审阅，根据最新的2025

## Finding

months were reviewed, based on the most updated social insurance receipt of July 2025, auditor found that only 34 out of 46 eligible employees (74%) had participated in basic endowment insurance, unemployment insurance, basic medical insurance and maternity insurance, all of 46 employees (100%) had participated in employment injury insurance.

This question was rated as No because the facility did not have adequate process to ensure all employees are covered by social insurance.

Remark:

1) The facility did not purchase commercial injury insurance for employees.

2) Interviewed employees stated that they participated in social insurance in voluntary basis.

3) No temporary and dispatch workers were used, no retirees, no new employees in the facility.

In accordance with the Social Insurance Law of the People's Republic of China, Article 10 Employees shall participate in the basic endowment insurance, and the basic endowment insurance premiums shall be jointly paid by employers and employees. Article 23 Employees shall participate in the basic medical insurance for employees, and the basic medical insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 33 Employees shall participate in the employment injury insurance, and the employment injury insurance premiums shall be paid by their employers rather than the employees. Article 44 Employees shall participate in unemployment insurance, and the unemployment insurance premiums shall be jointly paid by employers and employees in accordance with the relevant provisions of the state. Article 53 Employees shall participate in maternity insurance.

年7月的社保收据，审核员发现企业的46位符合条件的员工中只有34位(74%)按要求参加了养老保险、失业保险、医疗保险和生育保险，所有46名员工(100%)都参加了工伤保险。

该问题点选No，因为企业没有适当的流程来确保所有员工都参加社保。

备注：

1) 企业没有为员工购买商业意外险。2) 面谈员工表示参加社保是自愿的。3) 企业没有雇用临时工和劳务派遣工，没有退休返聘员工，无新进员工。

依据《中华人民共和国社会保险法》第十条，职工应当参加基本养老保险，由用人单位和职工共同缴纳基本养老保险费。第二十三条 职工应当参加职工基本医疗保险，由用人单位和职工按照国家规定共同缴纳基本医疗保险费。第三十三条 职工应当参加工伤保险，由用人单位缴纳工伤保险费，职工不缴纳工伤保险费。第四十四条 职工应当参加失业保险，由用人单位和职工按照国家规定共同缴纳失业保险费。第五十三条 职工应当参加生育保险，由用人单位按照国家规定缴纳生育保险费。

## PA 6: Decent Working Hours

Site: Top Blue Manufacturing Co., Ltd. | Site amfori ID: 156-011874-002

**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

6.2 The monthly overtime hours of 8 out of 8 randomly selected employees were 54 hours in June 2025 (current month), 8 out of 8 randomly selected employees were 64 hours in March 2025 (random month), 8 out of 8 randomly selected employees were 58 hours in December 2024 (current month).

This question was rated as No because the facility did not have effective process to control overtime hours.

In accordance with the PRC Labour Law article 41 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and labourers, but the extended working hour for a day shall generally not exceed one hour; if such extension is called for due to special reasons, the extended hours shall not exceed three hours a day under the condition that the health of labourers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours.

在2025年6月份（当前月），8名抽样员工中的8名月加班时间为54小时。在2025年3月份（随机月），8名抽样员工中的8名月加班时间为64小时，在2024年12月份（随机月），8名抽样员工中的8名月加班时间为58小时。

该问题点选No，因为企业没有有效的措施控制加班。

依据《中华人民共和国劳动法》第41条，用人单位由于生产经营需要，经与工会和劳动者协商后可以延长工作时间，一般每日不得超过一小时；因特殊原因需要延长工作时间的，在保障劳动者身体健康的条件下延长工作时间每日不得超过三小时，但是每月不得超过三十六小时。

## PA 7: Occupational Health and Safety

Site: Top Blue Manufacturing Co., Ltd. | Site amfori ID: 156-011874-002

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

### ENGLISH

### LOCAL LANGUAGE

## Finding

7.1 Based on onsite observation, documents review and employee interviews, auditor found that the facility did not fully comply with the health and safety legal requirement during the audit. Please refer to relevant checkpoints for details.

This question was rated as Partially because the facility collected the applicable occupational health and safety regulations applicable for its activities and established the occupational health and safety procedures, but there were gaps identified in implementation.

This finding was against amfori BSCI Code of Conduct, Principle on Occupational Health and Safety.

基于现场观察，文件审核及员工访谈，发现企业没有完全符合安全健康的法规要求。详情请参考相关检查点。

该问题点选Partially，因为企业有收集适用其生产经营活动的健康安全的法律法规和建立了健康安全的程序，但在执行方面有所欠缺。

该问题点违反了BSCI行为准则-职业健康安全。

**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
<b>Finding</b>	
<p>7.11</p> <p>1. During documents review, auditor found that the facility could not provide fire certificate for one 2-storey building and one 3-storey building for review.</p> <p>In accordance with PRC Fire Prevention Law article 11, the construction projects that are subject to fire protection acceptance according to law, shall not be put into use without going through the inspection or passing the inspection. Other construction projects that failed to pass the sample inspection according to law shall be stopped in use.</p> <p>2. During documents review, auditor found that the facility could not provide the report of construction completion acceptance for one 2-storey building and one 3-storey building for review.</p> <p>In accordance with the PRC Construction Law Article 61, a construction project handed over for acceptance checks for completion must conform to the prescribed construction project quality standards, be provided with complete project technical and economic data and signed project warranty, and be provided with other qualified conditions for completion as prescribed by the state. A construction project may only be handed over for use upon passing the acceptance checks for completion; no construction project shall be handed over for use without going through the acceptance checks for completion or passing the acceptance checks for completion.</p> <p>This question was rated as No because the facility has no process to ensure the building approvals were obtained.</p>	<p>1. 通过文件审核，审核员发现企业无法提供其1栋2层和1栋3层建筑的消防验收合格证明供审阅。依据《中华人民共和国消防法》第十一条，依法应当进行消防验收的建设工程，未经消防验收或者消防验收不合格的，禁止投入使用；其他建设工程经依法抽查不合格的，应当停止使用。</p> <p>2. 通过文件审核，审核员发现企业无法提供其1栋2层和1栋3层建筑的建筑竣工验收报告供审阅。依据《中华人民共和国建筑法》第六十一条，交付竣工验收的建筑工程，必须符合规定的建筑工程质量标准，有完整的工程技术经济资料和经签署的工程保修书，并具备国家规定的其他竣工条件。建筑工程竣工验收合格后，方可交付使用；未经验收或者验收不合格的，不得交付使用。</p> <p>该问题点选No，因为企业没有确保所有建筑获得相关批复的流程。</p>

**Question:** 7.21 Is there satisfactory evidence that the auditee provides workers with access to an appropriate, clean area for storing food, eating and/or cooking?

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>7.21 During facility tour, auditor found that one kitchen and canteen in the facility, but the facility did not obtain the Food Operation Permit.</p> <p>This question was rated as No because the facility</p>	<p>在现场巡查时，审核员发现企业有餐厅和厨房，但企业没有取得食品经营许可证。</p> <p>该问题点选No，因为企业没有确保获得食品经营许可证的流程。</p>

## Finding

has no process to ensure the Food Operation Permit was obtained.

In accordance with the Administrative Measures on Food Operation Permission Article 4, Food operation permission shall follow the principle of one permit for one site. Namely, one Food Operation Permit shall be obtained prior to the food operator engages in food business operations in a particular site.

依据《食品经营许可证管理办法》第4条，食品经营许可证可实行一地一证原则，即食品经营者在一个经营场所从事食品经营活动，应当取得一个食品经营许可证。