

Producer : [REDACTED]

DBID : 14997 and Audit Id : 72359

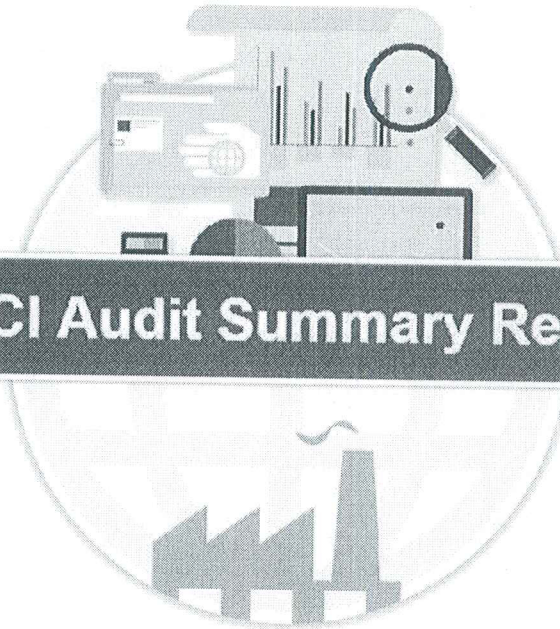
Audit Date : 26/12/2016

Audit Type : Follow-up Audit

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Auditee :	[REDACTED]
Audit Date From :	26/12/2016
Audit Date To :	27/12/2016
Expiry Date of the Audit :	Please refer to the producer profile in the BSCI platform
Auditing Company :	Intertek
Auditor's Name(s) :	Jim Lai(Lead)
Auditing Branch (if applicable) :	Intertek North East China

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# BSCI Audit Summary Report

This is an extract of the on line Audit Report. The complete report is available in the BSCI Platform.  
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\* This is an extract of the BSCI Audit Report, which is available in the BSCI Platform. © Foreign Trade Association (FTA), 2013 - The English version is the legally binding One.

**Rating Definitions**

Rating	A combination of ratings per performance area where:	Consequence																																													
<b>A OUTSTANDING</b>	<ul style="list-style-type: none"> <li>o Minimum 7 performance area rated A</li> <li>o No Performance area rated C, D or E</li> </ul> <p>These are three examples:</p> <table border="1"> <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><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>A</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>A</td><td>A</td><td>A</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</td><td>D</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	A	A	A	B	B	B	B	A	A	A	A	A	A	A	A	D	D	D	D	D	D	D	The auditee has the level of maturity to maintain its improvement process without needing 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	A	A	A	B	B	B	B																																	
A	A	A	A	A	A	A	A	D	D	D	D	D	D	D																																	
<b>B GOOD</b>	<ul style="list-style-type: none"> <li>o Maximum 3 performance area rated C</li> <li>o No performance area rated D or F</li> </ul> <p>These are three examples:</p> <table border="1"> <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><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>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></tr> <tr><td>B</td><td>E</td><td>B</td><td>B</td><td>B</td><td>B</td><td>E</td><td>B</td><td>B</td><td>B</td><td>B</td><td>C</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	B	B	A	A	A	A	A	A	B	B	B	B	B	B	B	B	C	B	E	B	B	B	B	E	B	B	B	B	C	C	C	C	The auditee has the level of maturity to maintain its improvement process without needing follow-up audit.
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A	A	A	A	A	A	B	B	B	B	B	B	B	B	C																																	
B	E	B	B	B	B	E	B	B	B	B	C	C	C	C																																	
<b>C ACCEPTABLE</b>	<ul style="list-style-type: none"> <li>o Maximum 2 performance areas rated D</li> <li>o No performance area rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <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>C</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>A</td><td>B</td><td>E</td><td>B</td><td>B</td><td>C</td><td>C</td><td>C</td><td>D</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>C</td><td>C</td><td>D</td><td>D</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	C	C	C	C	C	A	A	A	A	A	A	B	E	B	B	C	C	C	D	D	C	C	C	C	C	C	C	C	C	C	C	C	C	D	D	The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.
A	A	A	A	A	A	A	A	A	A	C	C	C	C	C																																	
A	A	A	A	A	A	B	E	B	B	C	C	C	D	D																																	
C	C	C	C	C	C	C	C	C	C	C	C	C	D	D																																	
<b>D INSUFFICIENT</b>	<ul style="list-style-type: none"> <li>o Maximum 6 performance area rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <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><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>C</td><td>D</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><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	A	A	A	A	D	D	D	D	D	A	A	A	B	B	B	C	C	C	C	D	D	D	D	E	D	D	D	D	D	D	D	D	E	E	E	E	E	E	E	The auditee needs follow up on its progress. The auditee develops a remediation plan within 60 days following the completion of the audit.
A	A	A	A	A	A	A	A	A	A	D	D	D	D	D																																	
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D	D	D	D	D	D	D	D	E	E	E	E	E	E	E																																	
<b>E UNACCEPTABLE</b>	<ul style="list-style-type: none"> <li>o Minimum 7 performance areas rated E</li> </ul> <p>These are three examples:</p> <table border="1"> <tr><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>A</td><td>F</td><td>F</td><td>F</td><td>F</td><td>F</td><td>F</td><td>F</td><td>F</td><td>F</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><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><td>E</td><td>E</td></tr> </table>	A	A	A	A	A	A	F	F	F	F	F	F	F	F	F	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	E	E	E	E	BSCI participants shall closely oversee the auditee's progress as it may represent a higher risk than other business partners.
A	A	A	A	A	A	F	F	F	F	F	F	F	F	F																																	
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	E	E	E	E																																	
<b>Zero Tolerance</b>	A Zero Tolerance issue was identified (see Annex 5)	Immediate actions are required. The BSCI Zero Tolerance Protocol is to be followed.																																													

Producer : [REDACTED]

DBID : 14997 and Audit Id : 72359

Audit Date : 26/12/2016

Audit Type : Follow-up Audit

**Main Auditee Information** 

Name of producer :	[REDACTED]		
DBID number :	[REDACTED]		
Audit ID :	72359		
Address :	[REDACTED]		
Province :	[REDACTED]	Country :	China
Management Representative :	[REDACTED]		
Contact person:	[REDACTED]	Sector :	Non-Food
Industry Type :	Sports equipment and sportwear	Product group :	sports equipment
Product Type :	Sports bottle		



Producer : [REDACTED]

Audit Type : Follow-up Audit

Audit Date : 26/12/2016

**Ratings Summary**



**Auditee's background information**

Auditee's name :	[REDACTED]	Legal status :	Limited Company
Local Name :	[REDACTED]	Year in which the auditee was founded :	2005
Address :	[REDACTED]	Contact person (please select) :	[REDACTED]
Province :	[REDACTED]	Contact's Email :	[REDACTED]
City :	[REDACTED]	Auditee's official language(s) for written communications :	Mandarin
Region :	North East Asia	Other relevant languages for the auditee :	Nil
Country :	China	Website of auditee (if applicable) :	Not applicable
GPS coordinates :	Not provided	Total turnover (in Euros) :	4000000.00
Sector :	Non-Food	Of which exports % :	100.00
Industry :	Sports equipment and sportwear	Of which domestic market % :	0.00
If other, please specify :		Production volume :	400000 pieces per month
Product Group :	sports equipment	Production cost calculation :	Yes
If other, please specify :		Lost time injury calculation cost :	Yes
Product Type :	Sports bottle		

**Auditee's employment structure at the time of the audit**

Total number of workers :	121	Total number of workers in the production unit to be monitored (if applicable) :	0
		<b>MALE WORKERS</b>	<b>FEMALE WORKERS</b>
Permanent workers		60	61
Temporary workers		0	0
In management positions		5	7
Apprentices		0	0
On probation		0	0
With disabilities		0	0
Migrants (national citizens)		41	42
Migrants (foreign citizens)		0	0
Workers on the permanent payroll		60	61
Production based workers		55	54
With shifts at night		4	3
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 - 72359] Audit Date: 26/12/2016 PA Score: D Deadline date:30/11/2017

**GOOD PRACTICES:**  
None observed

**AREAS OF IMPROVEMENT:**

The facility had set up some management procedures to implement the BSCI Code of Conduct, but not all policies were properly implemented. Managers were appointed to ensure that the BSCI values and their level of alignment with BSCI COC. The facility does not have good overview of its significant business partner's level of alignment of BSCI Code of Conduct. The facility had realistically calculated the costs of production and delivery times and the written records of calculating the production capacity or the costs of production were available. The working hours and overtime hours could be verified, and the overtime hours were within the law requirement.

Based on satisfactory evidence, the main auditee partially respects this principle because:

企业建立了确保BSCI COC有效实施的管理制度, 但是不是所有制度都得以有效实施; 企业指定了高级经理以确保充分遵循BSCI价值和原则要求; 被审核方对其重要供应商符合BSCI行为准则的水平不了解, 被审核方了解如何计算生产产能和订单周期, 也保留了计算方法和记录查看, 工人的工作时间和加班时间可以验证, 且加班时间符合法律规定。

基于令人满意的证据, 被审核方部分尊重该原则, 原因如下:

- 1.1 - 1.1 The facility had set up some management procedures to implement the BSCI Code of Conduct, but not all policies were properly implemented, such as, findings were raised in the following Performance areas: Fair Remuneration, Occupational Health and Safety, Protection of the Environment and Ethical Business Behaviour. It partially respects Performance area 1.1.  
  
1.1企业建立了确保BSCI COC有效实施的管理制度, 但是不是所有制度都得以有效实施, 比如, 在如下绩效领域: 公平报酬、职业健康与安全、保护环境和道德的商业行为都存在审核发现点。这部分尊重绩效区域1.1
- 1.3 - 1st follow up audit (December 26-27, 2016)  
The finding had not been corrected.  
1.3 The facility does not have good overview of its significant business partner's level of alignment of BSCI Code of Conduct. It does not respect Performance area 1.3.  
  
1.3 被审核方对其重要供应商符合BSCI行为准则的水平不了解, 这尚未尊重绩效区域1.3。
- 1.4 - 1st follow up audit (December 26-27, 2016)  
The finding had been corrected.  
The facility had realistically calculated the costs of production and delivery times and the written records of calculating the production capacity or the costs of production were available. The working hours and overtime hours could be verified, and the overtime hours were within the law requirement.  
  
被审核方了解如何计算生产产能和订单周期, 也保留了计算方法和记录查看, 工人的工作时间和加班时间可以验证, 且加班时间符合法律规定。

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: E Deadline date:31/12/2016

**Good practices:**  
None observed

**Areas of improvement**

Auditor noted that the auditee had appointed a senior manager to ensure that the BSCI values and principles are followed in a satisfactory manner. But based on satisfactory evidence, the main auditee does not respect this principle.  
审核员发现被审核方已委派高级经理以确保充分遵循BSCI价值和原则要求。但基于令人满意的证据, 被审核方尚未尊重BSCI的本条原则。

- 1.1 - The facility had set up some management procedures to implement the BSCI Code of Conduct, but not all policies were properly implemented, such as insufficient social insurance was participated etc. It partially respects Performance area 1: Social Management System and Cascade Effect 1.1.  
企业建立了确保BSCI COC有效实施的管理制度, 但是不是所有制度都得以有效实施, 比如社保缴纳不足等。这部分尊重绩效区域#1社会责任管理体系及其级联效应1.1
- 1.3 - The auditee does not have good overview of its significant business partner's level of alignment of BSCI Code of Conduct. It does not respect Performance area 1: Social Management System and Cascade Effect 1.3.  
被审核方对其重要供应商符合BSCI行为准则的水平不了解, 这尚未尊重绩效区域#1-社会责任管理体系及其级联效应1.3。
- 1.4 - The facility had realistically calculated the costs of production and delivery times and the written records of calculating the production capacity or the costs of production were available. But, the working hours and overtime hours could not be verified, so the validity of production and delivery times could not be verified. It partially respects Performance area 1: Social Management System and Cascade Effect 1.4.  
被审核方了解如何计算生产产能和订单周期, 也保留了计算方法和记录查看, 但是工人的工作时间和加班时间无法判断, 工厂的产能规划有效性无法判断。这部分尊重绩效区域#1-社会责任管理体系及其级联效应1.4。

**Remarks from Auditee**

Producer : [REDACTED]

DBID : [REDACTED]

Audit Date : 26/12/2016

Audit Type : Follow-up Audit

**Performance Area 2 : Workers Involvement and Protection**

1- Followup Audit (Audit Id - 72359) Audit Date: 26/12/2016 PA Score: A Deadline date:

**GOOD PRACTICES:**  
None observed

**AREAS OF IMPROVEMENT:**

Workers and their representatives conducted meetings periodically to communicate workplace issues and employees also could report to management orally. Suggestion box were installed in the facility and grievance procedure was established in the facility.

No deviation was observed in this PA.

员工与他们的代表定期召开会议来沟通工作当中的问题, 员工也可以口头向管理层汇报问题。企业安装了意见箱, 并建立了申诉制度。

该绩效区未发现不符合项

2.2 - 1st follow up audit (December 26-27, 2016)  
The finding had been corrected.  
The auditee had defined long term goals to protect workers according to BSCI Code of Conduct.

企业已经依照BSCI行为准则制定了长期目标来保护员工权益。

2.4 - 1st follow up audit (December 26-27, 2016)  
The finding had been corrected.  
The auditee had provided training on BSCI requirement to managers, workers workers representatives to build sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation.

企业已经对管理层、员工和员工代表提供了BSCI要求的培训以提供一些能力建设给管理层、员工和员工代表, 使他们能够很好的贯彻执行BSCI行为准则。

**Remarks from Auditee:**

Full Audit (Audit Id - 66829) Audit Date: 19/09/2016 PA Score: C Deadline date: 31/12/2016

**Good practices**

None observed

**Areas of improvement**

Auditor noted that the auditee had established good management practices that involve workers and their representatives in sound information exchange on workplace issues, an effective operational-level grievance mechanism for individuals and communities. But based on satisfactory evidence, the main auditee partially respects this principle.

审核员发现被审核方具备良好的管理规范, 以便参与其中的工人及其代表能就工作场所问题进行信息交流, 已确立、或参与有效运行的个人和团体申诉机制。基于令人满意的证据, 被审核方部分尊重了BSCI的本条原则。

2.2 - The auditee did not define long term goals to protect workers according to BSCI Code of Conduct. It does not respect Performance area 2: Workers Involvement and Protection 2.2.  
被审核方没有依照BSCI行为准则制定长期目标来保护员工权益。这尚未尊重绩效区域#2工人参与和保护2.2。

2.4 - The auditee did not build sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation. It does not comply with BSCI Code of Conduct 2.4.  
被审核方没有提供一些能力建设给管理层、员工和员工代表, 使他们能够很好的贯彻执行BSCI行为准则。这尚未尊重绩效区域#2工人参与和保护2.4。

**Remarks from Auditee**

Producer : [REDACTED]

[REDACTED]

Audit Date : 26/12/2016

Audit Type : Follow-up Audit

**Performance Area 3 : The rights of Freedom of Association and Collective Bargaining**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A Deadline date:

**GOOD PRACTICES:**  
Not audit

**AREAS OF IMPROVEMENT:**  
Not audit  
Not audit

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: A Deadline date:

**Good practices:**  
None observed

**Areas of improvement**  
Auditor noted that the auditee respects the right of workers to form or to join unions in a free and democratic way, respected workers' right to bargain collectively, did not discriminate against workers because of their trade union membership, did not prevent workers representatives from having access to or interacting with workers in the workplace. No deviation was observed in this PA.  
审核员发现被审核方尊重工人以自由和民主的方式结社的权利, 尊重工人的集体谈判权, 未因工人担任工会成员而被歧视工人, 未阻止工人代表在工作场所联系或接触工人。该绩效区未发现不符合项。

**Remarks from Auditee**

**Performance Area 4 : No Discrimination**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A Deadline date:

**GOOD PRACTICES:**  
Not audit

**AREAS OF IMPROVEMENT:**  
Not audit  
Not audit

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: A Deadline date:

**Good practices:**  
None observed

**Areas of improvement**  
Auditor noted that the auditee takes the necessary measures to avoid or eradicate discrimination in the workplace, took the necessary preventative and remedial measures to ensure workers are not disciplined, dismissed or otherwise discriminated against because of their complaints against infringements of their rights and took the necessary preventative and remedial measures so workers are not harassed or disciplined on any grounds of discrimination listed in the BSCI Code. No deviation was observed in this PA.  
审核员发现被审核方采取必要的措施以在工作场所避免或消除歧视, 采取必要的预防和改善措施, 以确保工人不因他们对侵权的投诉而被惩戒、解雇或歧视。采取必要的预防和改善措施, 以便工人不会因BSCI守则列明的歧视行为受到骚扰或惩罚。该绩效区未发现不符合项。

**Remarks from Auditee**



**Performance Area 5 : Fair Remuneration**

1- Followup Audit (Audit Id - 72359) Audit Date: 26/12/2016 PA Score: E

Deadline date:30/11/2017

**GOOD PRACTICES:**  
None observed

**AREAS OF IMPROVEMENT:**

1. The basic wages paid to employees were higher than the local minimum wage.
2. Based on the provided payroll records, the facility had paid 200 percent of normal rate wage for overtime work on rest days. No overtime work was arranged on normal working days and holidays.
3. Employees received wages at about 25 days after the working period, which was within 30 days after the wage calculation period.
4. According to document review and employee interview, the facility had provided employees with all mandatory benefits per local/national law, such as annual leave, maternity leave and etc.
5. Based on social insurance document in November 2016 (latest month), out of all 120 employees, 7 employees were retired age employees, all rest 113 employees had participated in employment injury insurance, only 34 employees had participated in basic endowment insurance, 33 employees had participated in maternity insurance, 32 employees had participated in basic medical insurance, 29 employees had participated in unemployment insurance. Additionally, the facility had purchased commercial injury insurance for 7 retired age employees. The facility did not have system to ensure all applicable employees participate in social insurance according to the Law.

Based on satisfactory evidence, the main auditee partially respects this principle because:

1. 员工的基本工资高于最低工资标准。
2. 根据工资记录, 企业在休息日加班支付了平时工资的2倍, 工作日加班和法定假日没有加班。
3. 企业在25号发工资, 是在30天内领到了工资。
4. 根据文件审核和员工访谈, 企业法律规定的福利待遇, 如年假、产假等。
5. 根据2016年11月份(最近月)的社保付款凭证显示, 企业所有120名员工中, 有7名退休年龄员工, 其余113名员工均参加了工伤保险, 仅34名员工参加了基本养老保险, 33名员工参加了生育保险, 32名员工参加了基本医疗保险, 29名员工参加了失业保险。企业还给7名退休员工购买了商业工伤保险。企业没有机制来确保所有适用的员工均参加社会保险。

基于令人满意的证据, 被审核方部分尊重该原则, 原因如下:

- 5.1 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit had been corrected.  
No inconsistency was found between production records and attendance records in this audit. The working hours and wages could be verified. And the basic wages paid to employees were higher than the local minimum wage.

此次审核未发现生产资料和考勤记录有不一致, 工作时间和工资可以验证, 且企业支付给员工的基本工资高于最低工资标准。

- 5.4 - 1st follow up audit (December 26-27, 2016)  
The finding had not been corrected.  
5.4 The facility did not aware of living wages and did not know how to calculate the living wages. But all employees were paid higher than the local minimum wage standard and living wages.  
It partially respects the Performance area 5.4

5.4被审核方不清楚最低生活保障工资, 也不知道怎么核算最低生活保障工资。但企业所有员工的工资都高于最低工资标准和最低生活保障工资。其部分尊重绩效区域5.4

- 5.5 - 1st follow up audit (December 26-27, 2016)  
The finding 1 in previous audit had not been corrected.  
5.5 Based on social insurance document in November 2016 (latest month), out of all 120 employees, 7 employees were retired age employees, all rest 113 employees had participated in employment injury insurance, only 34 employees had participated in basic endowment insurance, 33 employees had participated in maternity insurance, 32 employees had participated in basic medical insurance, 29 employees had participated in unemployment insurance. Additionally, the facility had purchased commercial injury insurance for 7 retired age employees. The facility did not have system to ensure all applicable employees participate in social insurance according to the Law.  
It does not respect the Performance area 5.5, and does not comply 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, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state.

The finding 2 in previous audit had been corrected.  
The facility had updated the maternity leave which specified that 128 days maternity leave would be provided to female employees, which complied with law requirement.

前次审核中的发现点1尚未整改。

5.5根据2016年11月份(最近月)的社保付款凭证显示, 企业所有120名员工中, 有7名退休年龄员工, 其余113名员工均参加了工伤保险, 仅34名员工参加了基本养老保险, 33名员工参加了生育保险, 32名员工参加了基本医疗保险, 29名员工参加了失业保险。企业还给7名退休员工购买了商业工伤保险。企业没有机制来确保所有适用的员工均参加社会保险。  
其尚未尊重绩效区域5.5, 且不符合《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, 职工不缴纳生育保险费。

前次审核中的发现点2已经整改。

企业已经更新了产假制度, 规定将给女员工提供128天产假, 符合法律规定。

- 5.6 - 1st follow up audit (December 26-27, 2016)  
New finding was raised in this audit.  
5.6 According to the discipline policy posted in the security guard room, RMB100 would be fined for employee who stole a unilaminar bottle, RMB200 would be fined for employee who stole a bilaminar bottle and RMB 100 would be fined for employee who drinking water with the bottle produced in

the workshop. According to management and employee interview, the policy was being implement, but no one had ever been fined due to no such case was found out. It does not respect the Performance area 5.6.

5.6根据门卫室张贴的惩罚制度,偷拿企业单层杯子的员工将被罚款100元,偷拿企业双层杯子的员工将被罚款200元,在生产现场用公司生产的杯子喝水的员工将被罚款100元。根据管理人员和员工访谈,该政策在实施,但是因为没有发现违反规定的员工,所以还没有员工被罚过。其尚未尊重绩效区域5.6

Remarks from Auditee:

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: E

Deadline date:31/12/2016

Good practices

None observed

Areas of improvement

Auditor noted that the auditee paid wage in a timely manner, regularly and fully in legal tender and the level of wages reflects the skills and education of workers. But based on satisfactory evidence, the main auditee does not respect this principle.

5.1 - Minimum wages could not be verified due to following inconsistencies found: 1) According to the inspection record obtained from the injection workshop, auditor found that there were production activities at 19:50 and 23:50 on June 16, 2016. However, the provided attendance records showed that all the employees in the facility were rest at above time. 2) Through employees interview, it was noted that there were night shift work for injection employees, however, the provided attendance records showed that all the employees in the facility only work in day shift. It does not respect Performance area 5: Fair Remuneration 5.1, and did not comply with the PRC Labour Law article 48, Wages paid to labourers by the employing unit shall not be lower than the local standards on minimum wages. Opinion of the Ministry of Labour on Several Questions concerning the Implementation of the Labour Law (1995) article 57, employees, including those who are in probationary, training or internship period, shall not be paid lower than the local minimum standard. The local minimum wage standard for full-time work was set at RMB 1350 per month equivalent to RMB 7.76 per hour before November 1, 2015 and RMB 1530 per month, equivalent to RMB 8.79 per hour since November 1, 2015. 最低工资由于发现以下不一致导致无法确认: 1) 根据从注塑车间获得的检验报告, 审核员发现在2016年6月16日夜间19:50到23:50分有生产记录, 然而提供的考勤记录显示所有该企业员工在上述时间均上班。2) 通过员工面谈发现注塑员工有夜班工作, 但是企业提供的考勤记录显示企业所有员工均只上白班。这尚未尊重绩效区域#5公平报酬5.1, 且不符合《中华人民共和国劳动法》第48条, 用人单位支付劳动者的工资不得低于当地最低工资标准。劳动部关于印发《关于贯彻执行〈中华人民共和国劳动法〉若干问题的意见》的通知第57条, 劳动者与用人单位形成或建立劳动关系后, 试用、熟练、见习期间, 在法定工作时间内提供了正常劳动, 其所在的用人单位应当支付其不低于最低工资标准的工资。审核当地的全日制最低工资标准为2015年11月1日以前每月1350元(折算为每小时7.76元), 2015年11月1日起每月1530元(折算为每小时8.79元)。

5.4 - Auditee did not aware of the calculation method for decent living wage and did not identify the gap between actual remuneration and fair remuneration. It partially respects Performance area 5: Fair Remuneration 5.4 被审核方没有计算体面生活工资的意识且没有识别实际薪酬和公平薪酬的差距。这部分尊重绩效区域#5公平报酬5.4

5.5 - 1. Insufficient social insurance participated. Through document review, auditor found that there were total 124 employees in the facility, however, only 34 out of 124 employees had participated in basic endowment insurance; 32 out of 124 employees had participated in basic medical insurance; 33 out of 124 employees had participated in maternity insurance; 29 out of 124 employees had participated in unemployment insurance; 117 out of 124 employees had participated in employment injury insurance. Besides, the facility had purchased commercial injury insurance and commercial medical insurance for the rest 7 employees who had reached their legal retired ages from December 31, 2015 to December 31, 2016. It does not respect Performance area 5: Fair Remuneration 5.5, and did not comply with 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, and the maternity insurance premiums shall be paid by employers rather than employees in accordance with the relevant provisions of the state. 2. Maternity policies indicated insufficient maternity leave was provided to female employees. Through document review, auditor found that the maternity leave policy established by the facility was only 98 days for female employees which did not comply with local law requirement 128 days. From employee interview and management interview, no employee had applied for maternity leave in 2016. It partially respects Performance area 5: Fair Remuneration 5.5, and did not comply with the Special Regulations Concerning the Labour Protection of Female Employees article 7, female employees will receive no less than 98 days of maternity leave, including 15 days before childbirth. If the employee experiences a difficult childbirth, 15 extra days will be added. If the employee gives birth to more than one child, 15 extra days will be added for each additional child. For miscarriage under four (4) month of pregnancy, 15 days of maternity leave should be granted; if miscarriage after four (4) month of pregnancy, 42 days of maternity leave should be granted. Regulation on Population and Family Planning in Zhejiang Province Article 30 For couples who are compliant with laws and regulations on family planning since January 1, 2016, they shall be entitled to the following benefits:(1) The wife is entitled to 30 days of additional leave after the statutory maternity leave, without impact to the promotion, adjustment of wages, and calculation on length of service. The employers may grant other preferential treatment in accordance with specific situations;(2) The husband is entitled to 15 days of paternity leave. Wages, bonus and other benefits shall be provided as usual. 1. 社会保险参保不足: 通过文件审核, 审核员发现企业共124名员工, 只有34名员工参加了养老保险; 32名员工参加了医疗保险; 33名员工参加了生育保险; 29名员工参加了失业保险; 117名员工参加了工伤保险。企业为其余的7名达到退休年龄的员工购买了有效期从2016年1月1日到2016年12月31日的商业工伤保险和商业医疗保险。这尚未尊重绩效区域#5公平报酬5.5, 且不符合《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, 职工不缴纳生育保险费。2. 产假政策显示企业提供给女员工的产假不足: 通过文件审核, 审核员发现企业产假政策上仅提供98天的产假给女员工, 这与当地法规规定的128天产假不符。在与员工和管理人员面谈时得知没有女员工申请2016年的产假。这部分尊重绩效区域#5公平报酬5.5, 且不符合《女职工劳动保护特别规定》第七条 女职工生育享受98天产假, 其中产前可以休假15天; 难产的, 增加产假15天; 生育多胞胎的, 每多生育1个婴儿, 增加产假15天。女职工怀孕未满4个月流产的, 享受15天产假; 怀孕满4个月流产的, 享受42天产假。浙江省人口与计划生育条例 第三十条 2016年1月1日以后符合法律、法规规定生育子女的夫妻, 可以获得下列福利待遇:(一) 女方法定产假期满后, 享受三十天的奖励假, 不影响工资、津贴、奖金, 并计算工龄; 用人单位根据具体情况, 可以给予其他优惠待遇;(二) 男方享受十五天护理假, 工资、奖金和其他福利待遇照发。

Remarks from Auditee:

**Performance Area 6 : Decent Working Hours**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A

Deadline date:

**GOOD PRACTICES:**

None observed

**AREAS OF IMPROVEMENT:**

1. The assessor noted that the facility used electronic attendance records system to record employee attendance situation. Some records such as Production Records, Products Delivery Out Records, Inspection records and etc. had been reviewed, those records matched with the attendance records, meanwhile through employee interview, no inconsistency was found. The working hours and wages could be verified in current assessment.
2. Through document review and employee interview, normal working hours are 8 hours per day from Monday to Friday and 40 hours per week, which was in compliance with law.
3. Through document review and employee interview, the maximum overtime hours of all samples were 0 hour per day and 32 hours per month; the facility had paid 200% of normal rate wage for overtime work on rest days, no overtime work was arranged on normal working days and holidays, which complied with the law requirement.
4. Through document review and employee interview, employees are entitled to at least one day off in every consecutive seven day period; the maximum consecutive working days were 6 days.

Based on satisfactory evidence, the main auditee partially respects this principle because:

1. 审核发现企业使用电子考勤系统记录员工出勤情况, 通过查看生产记录, 如日报表、检验记录等, 这些记录与考勤记录相吻合, 没有发现不一致的日期, 企业的工作时间和工资可以验证。
2. 通过文件审核和员工访谈, 正常工作时间为自周一至周五每天8小时每周40小时, 符合法律规定。
3. 通过文件审核和员工访谈, 所有样本的最大加班时间为每天0小时每周32小时, 企业给休息日加班时间支付了2倍工资, 正常工作日和假日没有安排加班, 符合法律规定。
4. 通过文件审核和员工访谈, 员工7天内至少休息1天, 最长连续工作天数为6天。

基于令人满意的证据, 被审核方部分尊重该原则, 原因如下:

- 6.1 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit had been corrected.  
No inconsistency was found between production records and attendance records in this audit, the working hours and wages could be verified. And the normal working hours were 8 hours per day from Monday to Friday and 40 hours per week, which was in compliance with law.  
此次审核未发现生产资料和考勤记录有不一致, 工作时间和工资可以验证。且正常工作时间为每周从周一至周五每天8小时, 符合法律规定。
- 6.2 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit had been corrected.  
No inconsistency was found between production records and attendance records in this audit, the working hours and wages could be verified. And the maximum overtime hours of all samples were 0 hour per day and 32 hours per month; the facility had paid 200% of normal rate wage for overtime work on rest days, no overtime work was arranged on normal working days and holidays, which complied with the law requirement.  
此次审核未发现生产资料和考勤记录有不一致, 工作时间和工资可以验证。且所有样本的最大加班时间为每天0小时每周32小时, 企业给休息日加班时间支付了2倍工资, 正常工作日和假日没有安排加班, 符合法律规定。
- 6.4 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit had been corrected.  
No inconsistency was found between production records and attendance records in this audit, the working hours and wages could be verified. And the maximum consecutive working days of all samples were 6 days, which was in compliance with law.  
此次审核未发现生产资料和考勤记录有不一致, 工作时间和工资可以验证。且所有样本的最大连续工作天数为6天, 符合法律规定。

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: E

Deadline date: 31/12/2016

**Good practices**

None observed

**Areas of improvement**

Working hours and overtime hours could not be verified. Only based on the attendance records, auditor noted that the auditee did not require more than 40 regular working hours per week, without prejudice to the exceptions recognised by the ILO, granted workers the right to resting breaks in every satisfactory evidence, the main auditee does not respect this principle.

工作时间和加班时间无法判断。根据企业的考勤记录, 审核员发现被审核方(生产商)不会要求工人每周工作超出正常的40小时工作时间, 赋予工人在各工作日休息的权利, 赋予工人至少在七天内休息一天的权利。最大周工时为48小时。基于令人满意的证据, 被审核方尚未尊重BSCI的本条原则。

- 6.1 - Working hours could not be verified due to following inconsistencies found: 1) According to the inspection record obtained from the injection workshop, auditor found that there were production activities at 19:50 and 23:50 on June 16, 2016. However, the provided attendance records showed that all the employees in the facility were rest at above time. 2) Through employees interview, it was noted that there were night shift work for injection employees, however, the provided attendance records showed that all the employees in the facility only work in day shift. It does not respect Performance area 6: Decent Working hours 6.1, and did not comply with the Decision of the State Council on Revision of the "Provisions of the State Council on Employees' Working Time" Article 3, the normal working hour of employees shall be 8 hours a day and 40 hours per week.  
工作时间由于发现以下不一致导致无法确认: 1) 根据从注塑车间获得的检验报告, 审核员发现在2016年6月16日夜间19:50到23:50分有生产记录, 然而提供的考勤记录显示所有该企业员工在上述时间均上班。2) 通过员工面谈发现注塑员工有夜班工作, 但是企业提供的考勤记录显示企业所有员工均只上白班。这尚未尊重绩效区域#6体面劳动时间6.1, 且不符合《国务院关于修改〈国务院关于职工工作时间的规定〉的决定》第3条, 职工每日工作8小时、每周工作40小时。
- 6.2 - Working hours and Overtime wages could not be verified due to following inconsistencies found: 1) According to the inspection record obtained from the injection workshop, auditor found that there were production activities at 19:50 and 23:50 on June 16, 2016. However, the provided attendance records showed that all the employees in the facility were rest at above time. 2) Through employees interview, it was noted that there were night shift work for injection employees, however, the provided attendance records showed that all the employees in the facility only work in day shift. It does not

respect Performance area 6: Decent Working hours 6.2, and did not comply with requirement of 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 and did not comply with PRC Labour Law article 44, the employing unit shall, according to the following standards, pay labourers remuneration higher than those for normal working hours under any of the following circumstances: 1) to pay no less than 150% of the normal wages if the extension of working hours is arranged; 2) to pay no less than 200% of the normal wages if the extended hours are arranged on days of rest and no deferred rest can be taken; and 3) to pay no less than 300% of the normal wages if the extended hours are arranged on statutory holidays.

工作时间和加班工资由于发现以下不一致导致无法确认: 1) 根据从注塑车间获得的检验报告, 审核员发现在2016年6月16日夜間19:50到23:50分有生产记录, 然而提供的考勤记录显示所有该企业员工在上述时间均上班。2) 通过员工面谈发现注塑员工有夜班工作, 但是企业提供的考勤记录显示企业所有员工均只上白班。这尚未尊重绩效区域#6体面劳动时间6.2, 且不符合《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。《中华人民共和国劳动法》第44条, 有下列情形之一的, 用人单位应当按照下列标准支付高于劳动者正常工作时间工资的工资报酬: (一) 安排劳动者延长工作时间的, 支付不低于工资的百分之一百五十的工资报酬; (二) 休息日安排劳动者工作又不能安排补休的, 支付不低于工资的百分之二百的工资报酬; (三) 法定休假日安排劳动者工作的, 支付不低于工资的百分之三百的工资报酬。

6.4 - Working hours could not be verified due to following inconsistencies found: 1) According to the inspection record obtained from the injection workshop, auditor found that there were production activities at 19:50 and 23:50 on June 16, 2016. However, the provided attendance records showed that all the employees in the facility were rest at above time. 2) Through employees interview, it was noted that there were night shift work for injection employees, however, the provided attendance records showed that all the employees in the facility only work in day shift. It does not respect Performance area 6: Decent Working hours 6.4, and did not comply with the PRC Labour Law article 38, the employing unit shall guarantee that its staff and employees have at least one day off in a week.

工作时间由于发现以下不一致导致无法确认: 1) 根据从注塑车间获得的检验报告, 审核员发现在2016年6月16日夜間19:50到23:50分有生产记录, 然而提供的考勤记录显示所有该企业员工在上述时间均上班。2) 通过员工面谈发现注塑员工有夜班工作, 但是企业提供的考勤记录显示企业所有员工均只上白班。这尚未尊重绩效区域#6体面劳动时间6.4, 且不符合《中华人民共和国劳动法》第38条, 用人单位应当保证劳动者每周至少休息一日。

Remarks from Auditee

**Performance Area 7 : Occupational Health and Safety**

1- Followup Audit (Audit Id - 72359) Audit Date: 26/12/2016 PA Score: E

Deadline date:31/03/2017

**GOOD PRACTICES:**

None observed

**AREAS OF IMPROVEMENT:**

The facility had established some Occupational Health and Safety Management procedures, but not all procedures were properly implemented.

Based on satisfactory evidence, the main auditee partially respects this principle because:

企业建立了职业健康与安全管理制度, 但是不是所有的制度都得到有效的实施。

基于令人满意的证据, 被审核方部分尊重该原则, 原因如下:

7.3 - 1st follow up audit (December 26-27, 2016)

The finding in previous audit had been corrected.

The transmittable and nontransmittable diseases were particularly regarded in the risk assessment.

企业进行了传染性疾病与非传染性疾病的分类评估。

7.6 - 1st follow up audit (December 26-27, 2016)

The finding in previous audit had been corrected.

All employees who need Personal Protective Equipment were provided the appropriate equipment and the Personal Protective Equipment were properly worn by employees.

所有需要劳动保护用品的员工均提供了劳动保护用品, 且都佩戴好了。

7.7 - 1st follow up audit (December 26-27, 2016)

The finding in previous audit had been corrected.

The facility had provided secondary containers for all hazardous chemicals stored and used in the facility.

New finding was raised in this audit.

7.7 Hazardous chemicals, such as paint, thinner and etc. were used and stored in the facility, but the distribution, use and disposal of chemicals were not properly recorded.

It does not respect the Performance area 7.7

前次审核中的的发现点已经整改。

企业给使用和存放的化学品都设置了二次容器。

发现新的审核发现点。

7.7企业使用和存放危险化学品如油漆、稀释剂等, 但企业没有化学品分配、使用和处置的记录。其尚未尊重绩效区域7.7

7.8 - 1st follow up audit (December 26-27, 2016)

New finding was raised in this audit.

7.8 No hazardous chemical emergency response drill. It was noted that hazardous chemicals, such as paint, thinner and etc. were used and stored in the facility, but the facility did not conduct hazardous chemical emergency response drill.

It does not respect the Performance area 7.8, and did not comply with Regulations on the Safety Management of Dangerous Chemicals Article 70

Dangerous chemical units shall formulate the advance plan for emergent treatment of dangerous chemical accidents of their respective units, allocate the personnel of emergent treatment and the appliances and equipments of emergent treatment, and shall organize drillings regularly. The advance plan for emergent treatment of dangerous chemical accidents shall be reported for record to the local department of safety supervision and administration of the people's government at the level of city divided into districts.

7.8没有危险化学品应急演练。企业使用和存放危险化学品如油漆、稀释剂等, 但是企业没有进行化学品应急演练。

其尚未尊重绩效区域7.8, 且不符合《危险化学品安全管理条例》第七十条, 危险化学品单位应当制定本单位危险化学品事故应急预案, 配备应急救援人员和必要的应急救援器材、设备, 并定期组织应急救援演练。危险化学品单位应当将其危险化学品事故应急预案报所在地设区的市级人民政府安全生产监督管理部门备案。

7.11 - 1st follow up audit (December 26-27, 2016)

The finding 1 and 2 in previous audit had not been corrected.

7.11.1 No construction safety certificate for partial of building was provided. It was noted that facility could not provide the construction safety certificate for one flat building, which was previously used as polishing workshop, and now only stored with some semi-finished product warehouse. The facility had moved the polishing process to another production building.

It partially respects the Performance area 7.11, and did not comply 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.

7.11.2 No fire certificate or registered record for partial of building was provided. It was noted that facility could not provide the fire certificate or registered record for one flat building, which was previously used as polishing workshop, and now only stored with some semi-finished product warehouse. The facility had moved the polishing process to another production building.

It partially respects the Performance area 7.11, and did not comply with the PRC Fire Prevention Law article 11. The Ministry of Public Security of the State Council prescribes, for those densely populated places and special construction works, design documents shall be submitted to public security organs for safety review. Public security fire control institutions shall be responsible for the result. Article 13 the project completed with fire control design in accordance with the requirements of the State Technical Standards on Fire Control for Engineering Construction shall go through acceptance check and filing as stated below: 1. as is stated in Article 11, construction units shall apply to the public security fire control institutions for fire control acceptance check; 2. Other construction works and construction units shall file with public security fire control institutions and public fire control institutions shall conduct random inspection. Construction projects which are supposed to go through fire control acceptance check but do not or considered unqualified shall not be put into use. Other projects considered unqualified after acceptance check in accordance with law shall not be put into use.

7.11.1企业没有提供部分建筑的竣工验收报告供审阅。审核发现企业没有提供一栋平房的竣工验收报告, 该建筑之前用作抛光车间, 目前仅存放一些半成品

品。企业已经将抛光工序搬到另一栋生产楼内。  
其部分尊重绩效区域7.11, 且不符合《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。建筑工程竣工经验收合格后, 方可交付使用; 未经验收或者验收不合格的, 不得交付使用。

7.11.2 企业没有提供部分建筑的消防验收/备案供审阅。审核发现企业没有提供一栋平房的消防验收/备案, 该建筑之前用作抛光车间, 目前仅存放一些半成品。企业已经将抛光工序搬到另一栋生产楼内。

其部分尊重绩效区域7.11, 且不符合《中华人民共和国消防法》第十一条 国务院公安部门规定的大型的人员密集场所和其他特殊建设工程, 建设单位应当将消防设计文件报送公安机关消防机构审核。公安机关消防机构依法对审核的结果负责。第十三条 按照国家工程建设消防技术标准需要进行消防设计的建设工程竣工, 依照下列规定进行消防验收、备案: (一)本法第十一条规定的建设工程, 建设单位应当向公安机关消防机构申请消防验收; (二)其他建设工程, 建设单位在验收后应当报公安机关消防机构备案, 公安机关消防机构应当进行抽查。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。

7.15 - 1st follow up audit (December 26-27, 2016)

New findings were raised in this audit.

7.15.1 Malfunctioned exit sign. During facility tour, the exit sign on 1 out of all 4 safety exits of polishing workshop was malfunctioned. It partially respects the Performance area 7.15, and did not comply with the Code of Design on Building Fire Protection and Prevention GB50016-2014 Article 10.3.5, Lamplit Evacuation Indication Signs shall be installed at the public building, residential building of which the building height more than 54m, high-rise factory building (warehouse), and single layer or multilayer factory building of Category A, B or C. The setting shall conform to the following requirements: 1. It shall be installed right above the safety exit and evacuation door of assembly occupancies; 2. It shall be installed on the wall surface, at a height less than 1.0m to the floor, or on the floor surface, of evacuation passages and its corners. The interval between Lamplit Evacuation Indication Signs shall not more than 20m; the interval in passages in curve shall not more than 10m; the interval in the area of corners in the passages shall not more than 1.0m.

7.15.2 Malfunctioned emergency light. During facility tour, the emergency light on 1 out of all 4 safety exits of polishing workshop was malfunctioned. It partially respects the Performance area 7.15, and did not comply with the Code of Design on Building Fire Protection and Prevention (GB50016-2014) article 10.3.1, Emergency lighting shall be installed in the following places at civil buildings, factory buildings and warehouses of Category C, except for residential buildings at a height less than 27m: 1. Enclosed staircases, smoke-proof staircases and their anterooms, and anterooms or shared anterooms of fire elevators, emergency passageway, refuge storey (room); 2. Assembly occupancies such as auditorium, exhibition hall, multi-functional hall, and business hall, dining hall, teleorium with a building area more than 200m<sup>2</sup>; 3. Underground and semi-underground public populated factory buildings; 4. Evacuation passages at public buildings; 5. Workplaces and evacuation passages at densely

7.15.1 安全出口标志故障。现场走访时发现, 企业抛光车间所有4个安全出口中的1个上的安全出口标志故障。  
其部分尊重绩效区域7.15, 且不符合《建筑设计防火规范》GB50016-2014第10.3.5条, 公共建筑、建筑高度大于54m的住宅建筑、高层厂房(库房)和甲、乙、丙类单、多层厂房, 应设置灯光疏散指示标志, 并应符合下列规定: 1. 应设置在安全出口和人员密集的场所的疏散门的正上方; 2. 应设置在疏散走道及其转角处距地面高度1.0m以下的墙面或地面上。灯光疏散指示标志的间距不应大于20m; 对于袋形走道, 不应大于10m; 在走道转角区, 不应大于1.0m。

7.15.2 安全出口标志故障。现场走访时发现, 企业抛光车间所有4个安全出口中的1个上的应急灯故障。  
其部分尊重绩效区域7.15, 且不符合《建筑设计防火规范》(GB50016-2014)第10.3.1条, 除建筑高度小于27m的住宅建筑外, 民用建筑、厂房和丙类仓库的下列部位应设置疏散照明: 1. 封闭楼梯间、防烟楼梯间及其前室、消防电梯间的前室或合用前室、避难走道、避难层(间); 2. 观众厅、展览厅、多功能厅及建筑面积大于200m<sup>2</sup>的营业厅、餐厅、演播室等人员密集的场所; 3. 建筑面积大于100m<sup>2</sup>的地下或半地下公共活动场所; 4. 公共建筑内的疏散走道; 5. 人员密集的场所及疏散走道。

7.17 - 1st follow up audit (December 26-27, 2016)

The finding in previous audit had been corrected.

All forklift operators and travelling crane operators had obtained valid operator certificates, which were also provided for review.

所有叉车工和行车操作工都取得了有效的操作证, 并提供了相关证书供审核。

7.18 - 1st follow up audit (December 26-27, 2016)

New finding was raised in this audit.

7.18 Qualified first aiders did not cover all shifts. It was noted that there was about 7 employees in the injection department worked in 2 shifts from October 2016, which were from 7:30 to 16:30 with an hour break from 11:00 to 12:00 and from 16:30 to 1:00 of next day with half an hour break from 22:00 to 23:30. But all 4 first aiders only worked in day shift, from 7:30 to 16:30 with an hour break from 11:00 to 12:00, there was no first aiders arranged for the night shift of injection department.

It partially respects the Performance area 7.18

7.18 急救员没有覆盖所有的班次。审核发现注塑车间有7名员工自2016年10月开始采取2班制, 分别是7:30至16:30(中间从11:00至12:00休息1小时), 从16:30至1:00(中间从22:00至23:30休息半小时), 而所有4名急救员只上白班, 从7:30至16:30(中间从11:00至12:00休息1小时), 注塑车间晚班没有急救员。

其部分尊重绩效区域7.18

7.24 - 1st follow up audit (December 26-27, 2016)

The finding in previous audit had not been corrected.

7.24 The facility did not conduct evaluation on occupational hazard factors for partial of area. During facility tour, auditor found that hazardous factor such as high noise and dust exists in metalworking workshop in one flat building. However, the facility could not provide evaluation report of occupational hazardous factors for review.

Remark: The facility had provided the occupational hazardous factors testing report of metal working workshop and painting workshop located in one 3-storey production building.

It partially respect BSCI Performance area 7.24, and did not comply with Provisions on the Supervision and Administration of Workplace Occupational Health Article 20 An employing entity with occupational hazards shall entrust an occupational health technical service agency with corresponding qualification to conduct evaluation on occupational hazard factors at least once every year. An employing entity with severe occupational hazards shall, in addition to the above requirement, entrusts an occupational health technical service agency with corresponding qualification to conduct assessment on occupational hazard status at least once every three years. The results of the evaluation and assessment shall be kept in archive, reported to local administration department of work safety, and announced to the workers.

7.24 企业没有按要求为部分区域进行职业危害因素检测。在现场巡查时, 审核员发现在一栋一层生产楼的金工车间存在噪音和粉尘的职业危害因素。但是, 企业未能提供该作业场所的职业危害因素检测报告供审阅。

备注: 企业已经提供了位于一栋3层生产楼的金工和喷漆车间的职业危害因素检测报告供审阅。

这部分尊重绩效区域7.24, 且尚未符合《工作场所职业病危害因素检测与评价》第二十条, 存在职业病危害的用人单位, 应当委托具有相应资质的职业卫生技术服务机构, 每年至少进行一次职业病危害因素检测。职业病危害严重的用人单位, 除遵守前款规定外, 应当委托具有相应资质的职业卫生技术服务机构, 每三年至少进行一次职业病危害现状评价。检测、评价结果应当存入本单位职业卫生档案, 并向安全生产监督管理部门报告和劳动者公布。

Remarks from Auditee:

Full Audit [Audit Id - 86829] Audit Date: 19/09/2016 PA Score: B

Deadline date: 31/12/2016

Good practices

None observed

Areas of improvement

Auditor noted that the auditee sought to improve workers' protection in case of accident, including through compulsory insurance schemes. The facility had established emergency preparedness procedure such as fire emergency etc. Adequate firefighting equipment such as fire extinguishers and fire hydrants had been installed. Fire alarm, exit sign and emergency light were available and maintained regularly. All evacuation passages were kept unblocked. All exits were unblocked and unlocked. Through document review and employee interview, the facility had provided training such as first aid training, and etc. for employees when they joined in the facility. The facility conducted emergency evacuation drill twice per year. But based on satisfactory evidence, the main auditee partially respects this principle.

审核员发现被审核方在寻求改善意外发生时为工人提供了保护,包括通过强制保险方案。企业已经建立消防应急预案,足够的灭火设施如灭火器、消防栓等均已安装。此外,消防警铃,安全出口标志和应急灯也均安装并定期维护。所有的疏散通道和安全出口均未上锁。企业提供了急救培训和消防培训员工。消防演习每年安排2次。基于令人满意的证据,被审核方部分尊重了BSCI的本条原则。

7.3 - No transmittable and non-transmittable diseases risk assessment. Through document review, auditor found that the transmittable and non-transmittable diseases were not particularly regarded in the risk assessment. It partially respect Performance area 7: Occupational Health and Safety and Cascade Effect 7.3.

被审核方没有传染性、非传染性疾病风险评估,通过文件审阅,审核中发现被审核方没有进行传染性、非传染性疾病的分类评估。这部分尊重绩效区域#7职业健康安全7.3

7.6 - Employees did not properly wear PPE (Personal Protective Equipment). During facility tour, auditor found that total 5 employees with high noise and both 2 employees with high noise and dust working in the metalworking workshop in one flat building did not wear relevant earplugs and anti-dust masks which were provided by facility. It does not respect BSCI Performance area 7: Occupational Health and Safety 7.6, and did not comply with requirement of Law of the PRC on Work Safety article 42, manufacturing units shall provide personal protective equipment to employees.

Manufacturing units shall supervise and train employees to ensure they properly wear and use the personal protective equipment.  
员工未按佩戴劳动防护用品。在现场巡查时,审核员发现位于一栋一层的金工车间内共有5名员工接触噪音,共有2名员工接触噪音和粉尘,但是他们没有相应地佩戴企业提供的耳塞和防尘口罩。这尚未尊重绩效区域#7-职业健康与安全7.6,且尚未符合《中华人民共和国安全生产法》第42条,生产经营单位必须为从业人员提供符合国家标准或者行业标准的劳动防护用品,并监督、教育从业人员按照使用规则佩戴、使用。

7.7 - Safety facilities for hazardous chemicals were not compliant with legal requirement. During facility tour, auditor found that hazardous chemicals such as paint (Total volume was around 200L) were used in the paint spraying workshop on 2/F of one 3-storey production building, but there was no secondary containment. It partially respects BSCI Performance area 7: Occupational Health and Safety 7.7, and it did not comply with Regulations on hazardous characteristics of the dangerous chemicals they producing, storing, set up the corresponding safety facilities and equipments for monitoring, aeration, protection against exposure to sun, temperature adjusting, fireproof, fire fighting, flameproof, pressure discharging, prevention of toxicants, neutralization, moistureproof, protection against thunder, protection against static, antiseptis, prevention of leakage, protection dams or segregated operations, etc.. In addition, the units shall carry out maintenance and caring regularly according to the national standards, industrial standards or the relevant provisions of the State, thus to guarantee the safety operations of facilities and equipments.

危险化学品存放的安全设施不符合要求。在现场巡查时,审核员发现在一栋三层生产楼二楼的喷漆车间使用危险化学品例如油漆(总量约200升),但是没有按要设置防泄漏安全措施。这部分尊重绩效区域#7-职业健康与安全7.7,且尚未符合危险化学品安全管理条例第二十条,生产、储存危险化学品的单位,应当根据其生产、储存的危险化学品的种类和危险特性,在作业场所设置相应的监测、监控、通风、防晒、防温、防火、灭火、防爆、泄压、防毒、中和、防潮、防雷、防静电、防腐、防泄漏以及防护围堤或者隔离操作等安全设施、设备,并按照国家标准、行业标准或者国家有关规定对安全设施、设备进行经常性维护、保养,保证安全设施、设备的正常使用。生产、储存危险化学品的单位,应当在其作业场所和安全设施、设备上设置明显的安全警示标志。

7.11 - 1. No construction safety certificate was provided. During facility tour, auditor found that there was one flat building used as polishing workshop. However, the facility could not provide certificate or report of acceptance checks for completion of this building to review. It does not respect BSCI Performance area 7: Occupational Health and Safety 7.11, and did not comply with requirement of 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. 2. No fire certificate or registered record was provided. During facility tour, auditor found that there was one flat building used as polishing workshop. However, the facility could not provide fire certificate or registered record for this buildings to review. It does not respect BSCI Performance area 7: Occupational Health and Safety 7.11, and did not comply with requirement of PRC Construction Law Article 61, the Ministry of Public Security of the State Council prescribes, for those densely populated places and special construction works, design documents shall be submitted to public security organs for safety review. Public security fire control institutions shall be responsible for the result; Article 13 the project completed with fire control design in accordance with the requirements of the State Technical Standards on Fire Control for Engineering Construction shall go through acceptance check and filing as stated below: 1. as is stated in Article 11, construction units shall apply to the public security fire control institutions for fire control acceptance check. 2. Other construction works and construction units shall file with public security fire control institutions and public fire control institutions shall conduct random inspection. Construction projects which are supposed to go through fire control acceptance check but do not or considered unqualified shall not be put into use. Other projects considered unqualified after acceptance check in accordance with law shall not be put into use.

1. 企业没有提供建筑竣工验收报告供审阅。在现场巡查时,审核员发现企业有一栋一层建筑用于抛光车间,然而,企业无法提供这栋建筑的竣工验收报告。这尚未尊重绩效区域#7-职业健康与安全7.11,且尚未符合《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。2. 企业没有提供消防验收/备案供审阅。在现场巡查时,审核员发现企业有一栋一层建筑用于抛光车间,但企业无法提供这栋建筑的消防验收/备案。这尚未尊重绩效区域#7-职业健康与安全7.11,且尚未符合《中华人民共和国消防法》第十一条。国务院公安部门规定的大型的人员密集场所和其他特殊建设工程,建设单位应当将消防设计文件报送公安机关消防机构审核。公安机关消防机构依法对审核的结果负责。第十三条 按照国家消防技术标准需要进行消防设计的建设工程竣工,依照下列规定进行消防验收、备案:(一)本法第十一条规定的建设工程,建设单位应当向公安机关消防机构申请消防验收;(二)其他建设工程,建设单位在验收后应当报公安机关消防机构备案,公安机关消防机构应当进行抽查。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。

7.17 - No effective certificate for special appliance operator. 1) During document review, auditor found that the operating certificate of its only one forklift operator had been expired on September 13, 2016. 2) During facility tour, auditor found that there were two traveling cranes in the facility for goods transferring and loading, however the facility did not obtain the crane safety management operator certificate for review. It does not respect BSCI Performance area 7: Occupational Health and Safety 7.17, and it did not comply with Regulations on Safety Supervision of Special Appliance article 38, the operator of special appliances (mentioned in Article 2, such as boiler, compressing equipment, lift, lifting appliance, Operators and managers of special vehicles in the factory (onsite) shall undergo relevant examination and qualifications to obtain special appliances certificate from the Special Appliance Quality Safety Monitoring department before operating those appliances.

特种设备作业人员未取得有效的作业证书。1) 在文件审核时,审核员发现仅有的1名叉车操作员的资格证书于2016年9月13日过期。2) 在现场巡查时,审核员发现企业有两台起重机用于货物的搬运及装裁,但企业没有获得起重机安全管理人员资格证书供审阅。这尚未尊重绩效区域#7-职业健康与安全7.17,且尚未符合《特种设备安全监察条例》第25条,锅炉、压力容器、电梯、起重机械、客运索道、大型游乐设施、场(厂)内专用机动车辆的作业人员及其相关管理人员(以下统称特种设备作业人员),应当按照国家有关规定经特种设备安全监督管理部门考核合格,取得国家统一格式的特种作业人员证书,方可从

事相应的作业或者管理工作。

7.24 - The facility did not conduct evaluation on occupational hazard factors. During facility tour, auditor found that hazardous factor such as high noise and dust exists in metalworking workshop in one flat building. However, the facility could not provide evaluation report of occupational hazardous factors for review. It does not respect BSCI Performance area 7: Occupational Health and Safety 7.24, and did not comply with Provisions on the Supervision and Administration of Workplace Occupational Health Article 20 An employing entity with occupational hazards shall entrust an occupational health technical service agency with corresponding qualification to conduct evaluation on occupational hazard factors at least once every year. An employing entity with severe occupational hazards shall, in addition to the above requirement, entrusts an occupational health technical service agency with corresponding qualification to conduct assessment on occupational hazard status at least once every three years. The results of the evaluation and assessment shall be kept in archive, reported to local administration department of work safety, and announced to the workers.  
企业没有按要求进行职业危害因素检测。在现场巡查时, 审核员发现在一栋一层生产楼的金工车间存在噪音和粉尘的职业危害因素。但是, 企业未能提供该作业场所的职业危害因素检测报告供审阅。这尚未尊重绩效区域#7-职业健康与安全7.24, 且尚未符合《工作场所职业病危害因素检测》第二十条。存在职业病危害的用人单位, 应当委托具有相应资质的职业卫生技术服务机构, 每年至少进行一次职业病危害因素检测。职业病危害严重的用人单位, 除遵守前款规定外, 应当委托具有相应资质的职业卫生技术服务机构, 每三年至少进行一次职业病危害现状评价。检测、评价结果应当存入本单位职业卫生档案, 并向安全生产监督管理部门报告和劳动者公布。

Remarks from Auditee

**Performance Area 8 : No Child Labour**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A

Deadline date:

**GOOD PRACTICES:**  
None observed

**AREAS OF IMPROVEMENT:**

1. Also the facility had established the following system to ensure no recruitment of child labour:
    - 1) The facility will never employ and use any child labour under the age of 16 years old.
    - 2) Once workers have joined their original ID's are copied and given back to them whilst copies only are kept in their personnel file.
    - 3) Employees' ID and photo should be checked when employees were hired. The employees without valid ID certificates should not be hired.
  2. Checks of all workers files and facility tour showed that there was no child labor in the facility.
1. 企业建立了以下禁止使用童工的制度:
- 1) 企业不会使用任何16周岁以下的员工;
  - 2) 企业入职时需要提供身份证原件, 企业查看后还给员工同时保存复印件在员工档案中;
  - 3) 入职时检查员工的身份证和照片, 不录用没有有效身份证件的人。
2. 通过查看身份证复印件和现场走访, 企业没有使用童工。

Remarks from Auditee:

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: A

Deadline date:

Good practices

None observed

**Areas of improvement**

Auditor noted that the auditee does not engage in illegal child labour directly or indirectly, had established robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker, had adequate policies and procedures in writing toward protecting children from any kind of exploitation, had adequate and remedial policies and procedures to provide for further protection in case children are found to be working. No deviation was observed in this PA.  
审核员发现被审核方未直接或间接与非法童工订立合约, 确立了不会以任何方式贬低或不尊重工人的稳健年龄核实机制构成了招聘流程的一部分, 具备保护儿童免受任何剥削的充分书面政策和程序, 具备充分的改善政策和程序, 以便在发现儿童工作时为其提供进一步保护。该绩效区未发现不符合项。

Remarks from Auditee



Producer : [REDACTED]

Audit Type : Follow-up Audit

Audit Date : 26/12/2016

**Performance Area 9 : Special protection for young workers**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A

Deadline date:

**GOOD PRACTICES:**

Not audit

**AREAS OF IMPROVEMENT:**

Not audit  
Not audit

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: A

Deadline date:

**Good practices:**

None observed

**Areas of improvement**

The auditee had established the necessary mechanisms to prevent, identify and mitigate harm to young workers, seek to ensure young workers access to effective grievance mechanisms. No deviation was observed in this PA.  
被审核方已确立必要的机制防止、识别和减轻对青年工人的伤害，竭力确保青年工人使用有效的申诉机制。该绩效区未发现不符合项。

**Remarks from Auditee**

**Performance Area 10 : No Precarious Employment**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A

Deadline date:

**GOOD PRACTICES:**

Not audit

**AREAS OF IMPROVEMENT:**

Not audit  
Not audit

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: A

Deadline date:

**Good practices:**

None observed

**Areas of improvement**

Auditor noted that the auditee's employment relationships are not precarious for the workers, the auditee engages workers based on recognised and documented employment relationship, provided workers with understandable information before entering into employment, and did not use employment arrangements in a way that deliberately does not correspond to the genuine purpose of the law. No deviation was observed in this PA.  
审核员发现被审核方不存在缺乏保障的就业关系。根据经认可和登记的雇佣关系与工人订立合约，在确立雇佣关系前向工人提供可理解信息，未以跟法律真实目的产生冲突的方式使用雇佣协议。该绩效区未发现不符合项。

**Remarks from Auditee**

Producer : [REDACTED]

[REDACTED] Audit Date : 26/12/2016

Audit Type : Follow-up Audit

<b>Performance Area 11 : No Bonded Labour</b>	
1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A	Deadline date:
<b>GOOD PRACTICES:</b>	
Not audit	
<b>AREAS OF IMPROVEMENT:</b>	
Not audit Not audit	
<b>Remarks from Auditee:</b>	
Full Audit [Audit Id - 68829] Audit Date: 19/09/2016 PA Score: A	Deadline date:
<b>Good practices:</b>	
None observed	
<b>Areas of improvement</b>	
<p>Auditor noted that the auditee did not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, acted rigorously and diligently when engaging and recruiting migrant workers both directly and indirectly, did not subject workers to inhumane or degrading treatment, corporal punishment, mental or physical coercion or verbal abuse and had established all applicable disciplinary procedures in writing and has explained them verbally to workers in clear and understandable terms. No deviation was observed in this PA.</p> <p>审核员发现被审核方未参与任何形式的奴役、强迫劳动、抵债性劳动、契约奴役、拐卖或非自愿劳动, 严谨尽职地直接或间接与外来工订立合约和招聘外来工, 没有使工人受到不人道或有辱人格的待遇、受到体罚、精神上或身体上压迫或言语虐待, 确立所有适用的书面惩戒程序, 并以清楚、易于理解的方式向工人口头说明。该绩效区未发现不符合项。</p>	
<b>Remarks from Auditee</b>	

**Performance Area 12 : Protection of the Environment**

1- Followup Audit [Audit Id - 72359] Audit Date: 26/12/2016 PA Score: A

Deadline date:31/01/2017

**GOOD PRACTICES:**

None observed

**AREAS OF IMPROVEMENT:**

1. The facility had identified the significant impacts and environmental implications associated to its activity, but there was no grievance mechanism in place to address the environmental concerns of surrounding communities.
2. The facility had obtained the Environmental Impact Assessment, Environmental Impact Assessment (EIA) approval / registration and environmental protection acceptance checks report.
3. The facility had performed monitoring tests for waste gas and the testing report was provided for review.
4. The facility had provided the evidences, including contract, duplicated form for transferring hazardous waste and qualification of hazardous waste disposal unit, to prove that they had transferred the hazardous waste to the qualified unit

Based on satisfactory evidence, the main auditee partially respects this principle because:

1. 被审核方识别了其商业活动的重大影响以及对环境造成的后果, 但被审核方没有建立有关周围社区环境问题的申诉机制。
2. 企业取得了建设项目进行环境影响评价、环境影响评价批复/备案和环境保护竣工验收报告。
3. 企业已经对废气进行了检测, 且提供了检测报告供审核。
4. 企业提供了证据, 包括危废处理合同、危废转移联单、危废处理单位资质等, 证明危险废物是交给有资质的处理单位处理。

基于令人满意的证据, 被审核方部分尊重该原则, 原因如下:

- 12.1 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit was partially corrected.  
12.1 The facility had identified the significant impacts and environmental implications associated to its activity, but there was no grievance mechanism in place to address the environmental concerns of surrounding communities. It partially respects the Performance area 12.1
- 12.1 企业识别了其商业活动的重大影响以及对环境造成的后果, 但没有建立有关周围社区环境问题的申诉机制。其部分尊重绩效区域12.1。
- 12.3 - 1st follow up audit (December 26-27, 2016)  
The finding in previous audit had been corrected.  
The facility had performed monitoring tests for waste gas and the testing report was provided for review.
- 企业已经对废气进行了检测, 且提供了检测报告供审核。
- 12.4 - 1st follow up audit (December 26-27, 2016)  
The finding 1, 2 and 3 in previous audit had been corrected.
1. The facility had stored hazardous wastes and non-hazardous waste separately.
  2. No hazardous wastes were stored at open area without any protective measure.
  3. The facility had provided the evidences, including contract, duplicated form for transferring hazardous waste and qualification of hazardous waste disposal unit, to prove that they had transferred the hazardous waste to the qualified unit
1. 企业已经将危险废弃物与非危险废弃物分开贮存。
2. 企业中没有发现露天存放的危险废弃物。
3. 企业提供了证据, 包括危废处理合同、危废转移联单、危废处理单位资质等, 证明危险废物是交给有资质的处理单位处理。

**Remarks from Auditee:**

Full Audit [Audit Id - 66829] Audit Date: 19/09/2016 PA Score: D

Deadline date:31/12/2016

**Good practices**

None observed

**Areas of improvement**

Auditor noted that the auditee had obtained the EIA, the facility had identified the local environmental law collected to ensure integration of local environmental law into business performance. But based on satisfactory evidence, the main auditee does not respect this principle.

审核员发现被审核方已经获得环评, 已经识别环境法律法规并确保其运行符合环境法律法规。基于令人满意的证据, 被审核方尚未尊重BSCI的本条原则。被审核方没有识别环境因素。这尚未尊重绩效区域#12- 环境保护 12.1

- 12.1 - The auditee did not identify significant impacts and environmental implication associated to its activity. It does not respect Performance area 12: Protection of the Environment 12.1.
- 12.3 - The facility did not perform monitoring tests for pollutants. During facility tour, auditor found that the waste gas were generated from paint spraying workshop (located on 2/F of one 3-storey building). However, the facility did not obtain monitoring report of waste gas for review. It does not respect BSCI Performance area 12: Protection of the Environment 12.3, and did not comply with Measures for Administration of Environmental Surveillance Article 21 A discharging unit shall self-monitor the situation of pollutant discharge according to the requirements of environmental protection departments above county level and the technical manual of state environmental surveillance. If a discharging unit, conforming to technical manual of state environmental surveillance, is inspected by the environmental surveillance institution under the environmental protection department above county level to meet the requirements on capability and technical conditions, its surveillance data can be used as the basis for identification of the varieties and quantities of pollutants discharged. A discharge unit, without ability for environmental surveillance, shall commission an environmental surveillance institution under the environmental protection department or environmental surveillance institution identified by the environmental protection department at provincial level for surveillance; expenditure of the surveillance performed by an environmental surveillance institution after accepting the commission should be borne by the commissioning party, in accordance with the relevant state regulations. An environmental surveillance institution identified by the environmental protection department at provincial level refers to an institution engaged in environmental

surveillance but not under an environmental protection department, which can voluntarily apply to an environmental protection department at provincial level of the locality for the identification that it obtains the appropriate capability of environmental surveillance; if recognized to be qualified, the institution can be regarded as an environmental surveillance institution identified by the environmental protection department at provincial level. An environmental surveillance institution identified by the environmental protection department at provincial level should accept supervision and inspection by the environmental surveillance institution under the environmental protection department of the locality.

企业没有对污染物的排放进行监测。在现场巡查时, 审核员发现企业位于一栋三层楼二楼的喷漆车间会产生废气。但是企业没有获得废气的监测报告供审核员审阅。这尚未尊重绩效区域#12-环境保护12.3, 且尚未符合《环境监测管理办法》第21条, 排污者必须按照县级以上环境保护部门的要求和国家环境监测技术规范, 开展排污状况自我监测。排污者按照国家环境监测技术规范, 并经县级以上环境保护部门所属环境监测机构检查符合国家规定的技术要求和技术条件的, 其监测数据可作为核定污染物排放种类、数量的依据。不具备环境监测能力的排污者, 应当委托环境保护部门所属环境监测机构或者经省级环境保护部门认定的环境监测机构进行监测; 接受委托的环境监测机构所从事的监测活动, 所需经费由委托方承担, 收费标准按照国家标准有关规定执行。经省级环境保护部门认定的环境监测机构, 是指非环境保护部门所属的、从事环境监测业务的机构, 可以自愿向所在地省级环境保护部门申请证明其具备相适应的环境监测业务能力认定, 经认定合格者, 即为经省级环境保护部门认定的环境监测机构。经省级环境保护部门认定的环境监测机构应当接受所在地环境保护部门所属环境监测机构的监督检查。

12.4 - 1. Hazardous wastes were mixed with non-hazardous wastes. During facility tour, auditor found that the facility's hazardous wastes were mixed with non-hazardous wastes for storage, such as waste empty painting containers generated from paint spraying workshop on 2/F of one 3-storey production building stored with waste constructive materials such as waste wood. It does not respect BSCI Performance area 12: Protection of the Environment 12.4, and did not comply with PRC Law of Prevention and Treatment of Environmental Pollution by Solid Wastes Article 58, the collection and storage of hazardous wastes shall be classified according to the trails of the hazardous wastes. It is prohibited to collect, store, transport and dispose of hazardous wastes that are mutually incompatible and have not received safely treatment. It is prohibited to mix hazardous wastes with non-hazardous wastes for storage. 2. Hazardous wastes were stored in inappropriate. During facility tour, auditor found that the facility stored hazardous wastes at open area without any protective measure, such as waste empty paint containers generated from paint spraying workshop on 2/F of one 3-storey production building. It does not respect BSCI Performance area 12: Protection of the Environment 12.4, and did not comply with Standard for Pollution Control on Hazardous Waste Storage GB 18597-2001 6.2.4, sites for storage of containers for liquid and semi-solid hazardous wastes must have corrosion-resistant hardened ground, without cracks on the surface. 6.2.5 Aprons for blocking leakage shall be designed. The volumetric capacity of the ground and aprons shall be no less than the maximum capacity of the largest container or 1/5 of total load of the stored chemicals. 6.3.9 The piles of hazardous wastes should be able to resist wind, rain and sunrays. 3. Hazardous wastes were not transferred to qualified unit. During facility tour, auditor found that the hazardous wastes, including waste empty containers with paint and ink, were generated from painting workshop and printing workshop. During document review, the facility could not provide the evidences (such as contract, duplicated form for transferring hazardous waste and qualification of hazardous waste disposal unit) to prove that they had transferred the hazardous waste to the qualified unit. It does not respect BSCI Performance area 12: Protection of the Environment 12.4, and did not comply with PRC Law of Prevention and Treatment of Environmental Pollution by Solid Wastes, Article 57, it is prohibition that the hazardous wastes are provided or submitted to the unit which do not obtain the business permit to engage in collection, storage, utilization and disposal of hazardous wastes.

1. 危险废物与一般废物混合贮存。在现场巡查时, 审核员发现企业的危险废物混入非危险废物中贮存, 例如在一栋三层的生产楼二楼喷漆车间产生的废油漆空桶与废建筑材料例如废木板存放在一块。这尚未尊重绩效区域#12-环境保护12.4, 且尚未符合《中华人民共和国固体废物污染环境防治法》第58条, 收集、贮存危险废物, 必须按照危险废物特性分类进行。禁止混合收集、贮存、运输、处置性质不相容而未经安全性处置的危险废物。禁止将危险废物混入非危险废物中贮存。2. 危险废物储存不符合要求。在现场巡查时, 审核员发现企业直接将危险废物存放在露天地面上, 例如在一栋三层的生产楼二楼喷漆车间产生的废油漆空桶。这尚未尊重绩效区域#12-环境保护12.4, 且尚未符合《危险废物贮存污染控制标准》GB 18597-2001 6.2.4, 用以存放装载液体、半固体危险废物容器的地方, 必须有耐腐蚀的硬化地面, 且表面无裂隙。6.2.5 应设计堵截泄漏的裙脚, 地面与裙脚所围建的容积不低于堵截最大容器的最大储量或总储量的五分之一。6.3.9 危险废物堆要防风、防雨、防晒。3. 危险废物没有交给有资质单位处置。在现场巡查时, 审核员发现企业的喷漆车间和丝印车间产生危险废物, 包括空油漆桶、空油墨桶等。在文件审核中, 企业无法提供证据(危废处理合同、危废转移联单、危废处理单位资质等)证明危险废物是交给有资质的处理单位处理。这尚未尊重绩效区域#12-环境保护12.4, 且尚未符合《中华人民共和国固体废物污染环境防治法》第57条, 禁止将危险废物提供或者委托给无经营许可证的单位从事收集、贮存、利用、处置的经营活动。

Remarks from Auditee

**DEKLARACJA ZGODNOŚCI WE**  
**EC DECLARATION OF CONFORMITY**

My / We **LAVA GROUP S.C./ Reiter Polska Sp. z o.o.**  
(nazwa importera/ importer's name)

Ul. Eugeniusza Romera 4B, 02-784 Warszawa  
(adres importera / importer's address)

niniejszym deklarujemy, że następujący wyrób:  
*declare, under our responsibility, that the product:*

**Kubek termiczny HD160- stal nierdzewna 304 SS, nakrętka polipropylen PP**  
(nazwa wyrobu / name of the article) (typ wyrobu / type or model)

Spełnia wymagania następujących norm:  
*to which this declaration relates is in conformity with the following standards:*

**DIN 10955: 2004-06;**

**DIN 10955: 2023;**

**EN 1186-1: 2002;**

**EN 1186-3:2022;**

**EN 13130-1: 2004;**

**DIN 10531:2011-06;**

**European Pharmacopeia 5.0, Ph. Eur. Method 2.5.5.;**

(numer i data wydania normy / title, number and date of issue of the standards)

oraz jest zgodny z postanowieniami następujących rozporządzeń (dyrektyw):  
(following the provisions of):

Rozporządzenie ramowe WE nr **1935/2004** Parlamentu Europejskiego i Rady z 27 października 2004 r. w sprawie materiałów i wyrobów przeznaczonych do kontaktu z żywnością uchylające Dyrektywy 80/590/EWG i 89/109/EWG

Rozporządzenie Komisji (WE) NR **10/2011** z dnia 14 stycznia 2011 r. w sprawie materiałów i wyrobów z tworzyw sztucznych przeznaczonych do kontaktu z żywnością

Ustawa o żywności i paszy(LFGB, §§ **30, 31**)

Rozporządzenie Komisji (WE) nr **2023/2006** z dnia 22 grudnia 2006 r. w sprawie dobrej praktyki produkcyjnej w odniesieniu do materiałów i wyrobów przeznaczonych do kontaktu z żywnością.

Warszawa dnia 01.02.2024r.

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**BUREAU  
VERITAS**

# TEST REPORT

LAB NO. : (3224)012-0267  
DATE : Feb. 28, 2024  
PAGE : 1 OF 13

Applicant:  
**LAVA GROUP S.C./ REITER POLSKA SP. Z O.O.**  
EUGENIUSZA ROMERA 4B,  
02-784 WARSZAWA, POLAND

Date of Submission: 2024-01-12 and 2024-01-24  
Test Period: 2024-01-12 to 2024-02-01

Sample Description:	Black		
Sample Status:	Intact		
Manufacturer:		Buyer:	/
Style No.(s):	HD160, HD150	PO No.:	/
Country of Origin:	China	Country of Destination:	/
Color:	/	Vendor:	/

Test Item(s): Details see attached page(s).

**Overall Conclusion:** The sample(s) **MEET** the respective requirements for the below tested items as stated in German § 30 and 31 LFGB (Food and Feed Code) for materials in contact with foodstuffs.

## REMARK

If there are questions or concerns on this report, please contact the following persons:

Customer service

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BUREAU VERITAS TESTING TECHNICAL SERVICE (ZHEJIANG) CO.,LTD

Jane Ye  
TECHNICAL MANAGER

PREPARED BY: Jessie



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This report is governed by, and incorporates by reference, the Conditions of Testing as posted at the date of issuance of this report at <http://www.bureauveritas.com/home/about-us/our-business/cps/about-us/terms-conditions/> and is intended for your exclusive use. Any copying or replication of this report to or for any other person or entity, or use of our name or trademark, is permitted only with our prior written permission. This report sets forth our findings solely with respect to the test samples identified herein. The results set forth in this report are not indicative or representative of the quality or characteristics of the lot from which a test sample was taken or any similar or identical product unless specifically and expressly noted. Our report includes all of the tests requested by you and the results thereof based upon the information that you provided to us. Measurement uncertainty is only provided upon request for accredited tests. Statements of conformity are based on simple acceptance criteria without taking measurement uncertainty into account, unless otherwise requested in writing. You have 60 days from date of issuance of this report to notify us of any material error or omission caused by our negligence or if you require measurement uncertainty; provided, however, that such notice shall be in writing and shall specifically address the issue you wish to raise. A failure to raise such issue within the prescribed time shall constitute your unqualified acceptance of the completeness of this report, the tests conducted and the correctness of the report contents.



**BUREAU  
VERITAS**

**LAB NO. :** (3224)012-0267  
**DATE :** Feb. 28, 2024  
**PAGE :** 2 OF 13

**SUMMARY OF TEST RESULTS**

<b>TEST REQUESTED</b>	<b>CONCLUSION</b>
Sensory Test (Odour and Taste) for Materials in Contact with Foodstuffs – EC No. 1935/2004 and § 30 and 31 LFGB	PASS
Overall Migration Test for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments	PASS
Overall Migration Test for Silicon in Contact with Foodstuffs – Council of Europe, Resolution ResAP(2004)5	PASS
Specific Migration of Heavy Metals for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments	PASS
Specific Migration of Primary Aromatic Amine for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments	PASS
Total Chromium, Hafnium, Vanadium and Zirconium Content for Plastic Materials in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation	PASS
Peroxides Value for Plastic Materials in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation	PASS
Volatile Organic Matter Content for Silicon in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation	PASS
Extractable Matter Content for Silicon in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation	PASS
Migration of Heavy Metals Contents for Metal in Contact with Foodstuffs – EC No. 1935/2004, § 30 and 31 LFGB and Council of Europe Resolution CM/Res(2013)9 and BfR Recommendation	PASS
Specific Migration of 2,2,4,4-Tetramethyl-1,3-cyclobutanediol(TMCD) for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011 and Its Amendments	PASS
Polycyclic Aromatic Hydrocarbons (PAHs) Content – Regulation (EC) No. 1907/2006 Annex XVII Entry 50, Point 5	PASS
Bisphenol A (BPA) Content & As Applicant's requirement	PASS
Bisphenol A Contents for Materials in Contact with Foodstuffs – French Loi 2012-1442	PASS

Note: The tested part of the sample was specified by client.  
The test conclusion was given based on the results of tested part.  
Selected test items as requested by applicants.



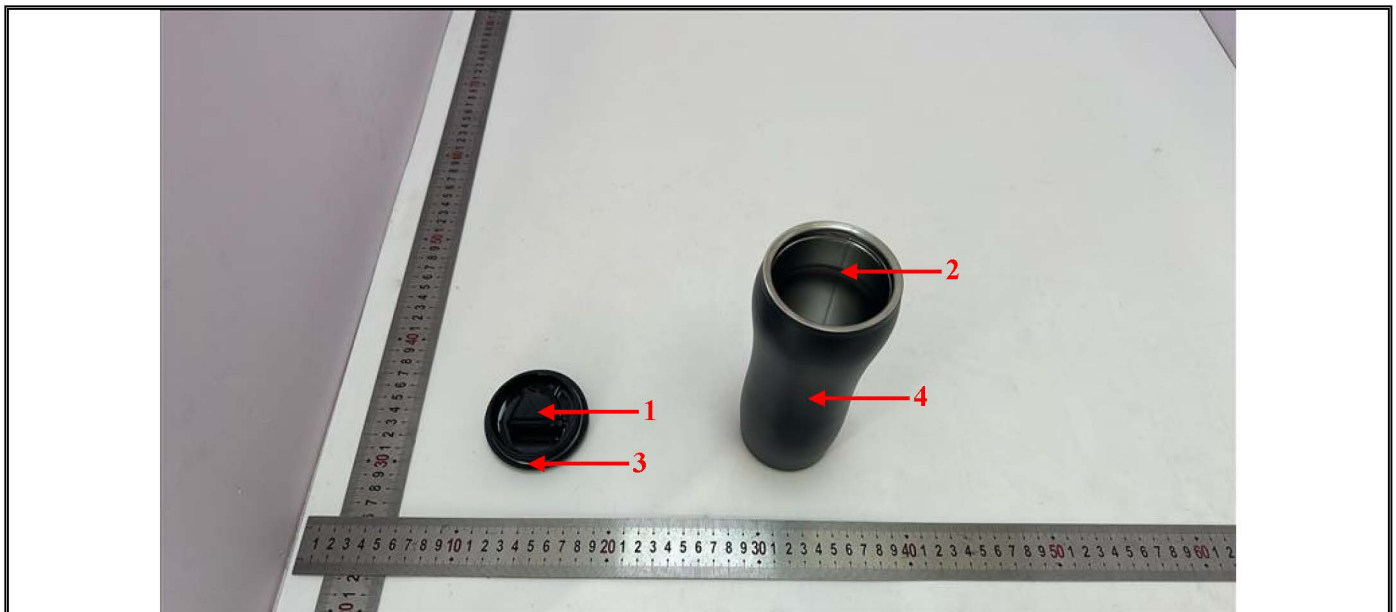
**BUREAU  
VERITAS**

LAB NO. : (3224)012-0267  
DATE : Feb. 28, 2024  
PAGE : 3 OF 13

**Sample Description Assigned by Laboratory:**

Test Item	Description	Client Claimed Material
1	Black plastic lid	PP
2	Silvery metal cup body (inner)	Stainless steel (304)
3	White silicone ring	Silicone
4	Black coating	-

**Photo of the Submitted Sample**



**32240120267**





**TEST RESULT**

**Sensory Test (Odour and Taste) for Materials in Contact with Foodstuffs – EC No. 1935/2004 and § 30 and 31 LFGB**

Parameter	Result			Maximum Allowable Limit
	1	2	3	
Odour transfer into foodstuff through simulant, Mineral water	0	0	0	2.5 Scale
Taste transfer into foodstuff through simulant, Mineral water	0	0	0	2.5 Scale
<b>Conclusion</b>	PASS	PASS	PASS	-

Note: Scale: 0 = no perceptible off-odour (or taste transfer);  
1 = off-odour (or taste transfer) just perceptible (but still difficult to define);  
2 = slight off-odour (or taste transfer);  
3 = distinct off-odour (or taste transfer);  
4 = strong off-odour (or taste transfer)

Method: DIN 10955: 2023

**Overall Migration Test for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments**

Test Condition: 2 h at 70 °C (3% Acetic acid)  
2 h at 70 °C (50% Ethanol)

Simulant Used	Unit	Result			Maximum Allowable Limit (3 <sup>rd</sup> )	Analytical Tolerance
		1				
		1st Migrate	2nd Migrate	3rd Migrate		
Food contact surface area	dm <sup>2</sup>	1.0			-	-
Volume of stimulant used	mL	100			-	-
3% Acetic acid	mg/dm <sup>2</sup>	<5	<5	<5	10	+2
50% Ethanol	mg/dm <sup>2</sup>	<5	<5	<5	10	+2
<b>Conclusion</b>	-	PASS			-	-

Note: “<” = less than  
mg/dm<sup>2</sup> = milligram per square decimeter

Method: EN 1186-1: 2002; EN 1186-3: 2022

Remark: 1) The migration test is carried out according to EC Regulation No. 10/2011 and the corresponding regulatory statutes.

2) For article intended for repeated use, the migration tests are carried out three times on the same test sample.



**Overall Migration Test for Silicon in Contact with Foodstuffs – Council of Europe, Resolution ResAP(2004)5**

Test Condition: 2 h at 70 °C (3% Acetic acid)  
 2 h at 70 °C (50% Ethanol)

Simulant Used	Unit	Result			Maximum Allowable Limit (3 <sup>rd</sup> )	Analytical Tolerance
		3				
		1st Migrate	2nd Migrate	3rd Migrate		
Food contact surface area	dm <sup>2</sup>	1.0			-	-
Volume of stimulant used	mL	100			-	-
3% Acetic acid	mg/dm <sup>2</sup>	<5	<5	<5	10	+2
50% Ethanol	mg/dm <sup>2</sup>	<5	<5	<5	10	+2
<b>Conclusion</b>	-	PASS			-	-

Note: “<” = less than  
 mg/dm<sup>2</sup> = milligram per square decimeter

Method: EN 1186-1: 2002; EN 1186-3: 2022

Remark: 1) The migration test is carried out according to EC Regulation No. 10/2011 and the corresponding regulatory statutes.

2) For article intended for repeated use, the migration tests are carried out three times on the same test sample.

**Specific Migration of Heavy Metals for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments**

Test Condition: 2 h at 70 °C (3% Acetic acid)

Parameter	Simulant Used	Unit	Result			Maximum Allowable Limit(3rd)
			1			
			1st Migrate	2nd Migrate	3rd Migrate	
Food contact surface area	-	dm <sup>2</sup>	0.84			-
Volume of stimulant used	-	mL	140			-
Barium (Ba)	3% Acetic acid	mg/kg	<0.1	<0.1	<0.1	1
Cobalt (Co)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
Copper (Cu)	3% Acetic acid	mg/kg	<0.5	<0.5	<0.5	5
Iron (Fe)	3% Acetic acid	mg/kg	<5	<5	<5	48
Lithium (Li)	3% Acetic acid	mg/kg	<0.1	<0.1	<0.1	0.6
Manganese (Mn)	3% Acetic acid	mg/kg	<0.1	<0.1	<0.1	0.6
Zinc (Zn)	3% Acetic acid	mg/kg	<0.1	<0.1	<0.1	5
Aluminum (Al)	3% Acetic acid	mg/kg	<0.1	<0.1	<0.1	1
Nickel (Ni)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.02
Antimony (Sb)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.04
Arsenic (As)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	Not detected
Cadmium (Cd)	3% Acetic acid	mg/kg	<0.002	<0.002	<0.002	Not detected



Chromium (Cr)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	Not detected
Europium (Eu)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
Gadolinium (Gd)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
Lanthanum (La)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
Lead (Pb)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	Not detected
Mercury (Hg)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	Not detected
Terbium (Tb)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
Sum of Europium (Eu), Gadolinium (Gd), Lanthanum (La), and/or Terbium (Tb)	3% Acetic acid	mg/kg	<0.01	<0.01	<0.01	0.05
<b>Conclusion</b>	-	-	PASS			-

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: EN 13130-1: 2004 and analysis by Inductively Coupled Plasma Mass Spectrometers (ICP-MS).

Remark: 1) The migration test is carried out according to EU regulation No. 10/2011 and the corresponding regulatory statutes.  
2) For article intended for repeated use, the migration tests are carried out three times on the same test sample.  
3) Due to the fact that SML for As, Cr, Pb, Hg is specified as not detectable meaning < 0.01 mg/kg and SML for Cd is specified as not detectable meaning < 0.002 mg/kg analysis and assessment has to be performed using the 1st migrate in any case no matter whether article/materials is intended for single or repeated use.

**Specific Migration of Primary Aromatic Amine for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011, Commission Regulation (EU) No. 2020/1245 and Its Amendments**

Test Condition: 2 h at 70 °C (3% Acetic acid)

**Primary Aromatic Amines (PAAs)**

Parameter	Unit	Result			Maximum Allowable Limit(3 <sup>rd</sup> )
		1			
		1st Migrate	2nd Migrate	3rd Migrate	
Aniline	mg/kg	<0.002	<0.002	<0.002	0.01(sum)
2,4-Dimethylaniline / 2,4-xylidine	mg/kg	<0.002	<0.002	<0.002	
2,6-Dimethylaniline / 2,6-xylidine	mg/kg	<0.002	<0.002	<0.002	
p-Phenylenediamine / 1,4-phenylenediamine	mg/kg	<0.002	<0.002	<0.002	
2,6-Toluenediamine	mg/kg	<0.002	<0.002	<0.002	
1,5-Diaminenaphthalene	mg/kg	<0.002	<0.002	<0.002	
<b>Conclusion</b>	-	PASS			-



**Primary Aromatic Amines (PAAs)**

Parameter	Unit	Result			Maximum Allowable Limit(3 <sup>rd</sup> )
		1			
		1st Migrate	2nd Migrate	3rd Migrate	
4-aminobiphenyl / 4-biphenylamine	mg/kg	<0.002	<0.002	<0.002	0.002
o-anisidine / 2-methoxyaniline	mg/kg	<0.002	<0.002	<0.002	0.002
Benzidine	mg/kg	<0.002	<0.002	<0.002	0.002
4-Chloro-aniline / p-chloroaniline	mg/kg	<0.002	<0.002	<0.002	0.002
4-Chloro-o-toluidine	mg/kg	<0.002	<0.002	<0.002	0.002
4,4'-Diaminodiphenylether / 4,4'-oxydianiline	mg/kg	<0.002	<0.002	<0.002	0.002
4,4'-Methylenedianiline / 4,4'-diamino-diphenylmethane	mg/kg	<0.002	<0.002	<0.002	0.002
4,4-Methylenedi-o-toluidine / 3,3'-dimethyl-4,4'-diaminodiphenylmethane	mg/kg	<0.002	<0.002	<0.002	0.002
2-Methoxy-5-methylaniline / p-cresidine	mg/kg	<0.002	<0.002	<0.002	0.002
4-Methoxy-m-phenylenediamine / 2,4-diaminoanisole	mg/kg	<0.002	<0.002	<0.002	0.002
o-Toluidine / 2-aminotoluene	mg/kg	<0.002	<0.002	<0.002	0.002
2,4-Toluenediamine	mg/kg	<0.002	<0.002	<0.002	0.002
3,3-Dimethylbenzidine	mg/kg	<0.002	<0.002	<0.002	0.002
2,4,5-Trimethylaniline	mg/kg	<0.002	<0.002	<0.002	0.002
m-Phenylenediamine / 1,3-phenylenediamine	mg/kg	<0.002	<0.002	<0.002	0.002
2-naphthylamine	mg/kg	<0.002	<0.002	<0.002	0.002
o-aminoazotoluene/ 4-amino-2',3'-dimethylazobenzene/ 4-o-tolylazo-o-toluidine	mg/kg	<0.002	<0.002	<0.002	0.002
5-nitro-o-toluidine	mg/kg	<0.002	<0.002	<0.002	0.002
3,3'-dichlorobenzidine	mg/kg	<0.002	<0.002	<0.002	0.002
3,3'-dimethoxybenzidine / o-dianisidine	mg/kg	<0.002	<0.002	<0.002	0.002
4,4'-methylene-bis-(2-chloro-aniline) / 2,2'-dichloro-4,4'-methylene-dianiline	mg/kg	<0.002	<0.002	<0.002	0.002
4,4'-thiodianiline	mg/kg	<0.002	<0.002	<0.002	0.002
4-amino azobenzene	mg/kg	<0.002	<0.002	<0.002	0.002
<b>Conclusion</b>	-	PASS			-

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: EN 13130-1: 2004, LC-MS/ LC-MS/MS analysis.

Remark: 1) The migration test is carried out according to EU regulation No. 10/2011 and the corresponding regulatory statutes.



2) PAA listed in entry 43 to Appendix 8 of Annex XVII to Regulation (EC) No 1907/2006 and 1,3-phenylenediamine are specified as not detectable meaning < 0.002 mg/kg, assessment has to be performed using the 1st migrate in any case no matter whether article/materials is intended for single or repeated use.

**Total Chromium, Hafnium, Vanadium and Zirconium Content for Plastic Materials in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation**

Parameter	Unit	Result	Maximum Allowable Limit
		1	
Total Chromium (Cr)	mg/kg	<2	10
Total Hafnium (Hf)	mg/kg	<10	100
Total Vanadium (V)	mg/kg	<2	20
Total Zirconium (Zr)	mg/kg	<10	100
<b>Conclusion</b>	-	PASS	-

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: Acid digestion and analysis by Inductively Coupled Argon Plasma Spectrometer (ICP).

Remark: The limit refers to BfR Recommendation VII.

**Peroxides Value for Plastic Materials in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation**

Parameter	Result		Maximum Allowable Limit
	1	3	
Peroxides	Absent	Absent	Absent
<b>Conclusion</b>	PASS	PASS	-

Method: European Pharmacopeia 5.0, Ph. Eur. Method 2.5.5.

Remark: The limit refers to BfR Recommendation VII, XV.

**Volatile Organic Matter Content for Silicon in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation**

Test Condition: 4 h at 200 °C

Parameter	Unit	Result	Maximum Allowable Limit
		3	
Volatile Organic Matter	% (w/w)	0.0954	0.5
<b>Conclusion</b>	-	PASS	-

Note: “<” = less than  
% w/w = percent weight by weight

Method: Gravimetric method.



Remark: 1) The limit refers to BfR Recommendation XV.

2) The cut sample was conditioned at 100 °C for 1 hour to remove sorbed water before treatment at 200°C for 4 hours.

**Extractable Matter Content for Silicon in Contact with Foodstuffs – § 30 and 31 LFGB and BfR Recommendation**

Parameter	Unit	Result	Maximum Allowable Limit
		3	
Extractable Matter	% w/w	<0.05	0.5
<b>Conclusion</b>	-	PASS	-

Note: “<” = less than  
% w/w = percent weight by weight

Method: Gravimetric method after reflux for 5 hours with water.

Remark: The limit refers to BfR Recommendation XV.

**Migration of Heavy Metals Contents for Metal in Contact with Foodstuffs – EC No. 1935/2004, § 30 and 31 LFGB and Council of Europe Resolution CM/Res(2013)9 and BfR Recommendation**

Test Condition: 0.5 % Citric acid: 2 h at 70 °C

Parameter	Unit	Result			Seven Times of Maximum Specific Release Limit(s) (SRLs) <sup>[a], [b]</sup>
		2		Sum of 1st & 2nd Migrate <sup>[a]</sup>	
		1st Migrate	2nd Migrate		
Filling volume	cm <sup>3</sup>	420	420	-	-
Volume of stimulant used	mL	280	280	-	-
Aluminum (Al)	mg/kg	<0.1	<0.1	<0.1	35
Antimony (Sb)	mg/kg	<0.004	<0.004	<0.004	0.28
Chromium (Cr)	mg/kg	<0.1	<0.1	<0.1	1.75
Cobalt (Co)	mg/kg	<0.005	<0.005	<0.005	0.14
Copper (Cu)	mg/kg	<0.5	<0.5	<0.5	28
Iron (Fe)	mg/kg	<5	<5	<5	280
Magnesium (Mg)	mg/kg	<0.5	<0.5	<0.5	-
Manganese (Mn)	mg/kg	<0.1	<0.1	<0.1	12.6
Molybdenum (Mo)	mg/kg	<0.01	<0.01	<0.01	0.84
Nickel (Ni)	mg/kg	<0.02	<0.02	<0.02	0.98
Silver (Ag)	mg/kg	<0.01	<0.01	<0.01	0.56
Tin (Sn)	mg/kg	<5	<5	<5	700
Titanium (Ti)	mg/kg	<0.5	<0.5	<0.5	-
Vanadium (V)	mg/kg	<0.002	<0.002	<0.002	0.07
Zinc (Zn)	mg/kg	<1	<1	<1	35
Arsenic (As)	mg/kg	<0.001	<0.001	<0.001	0.014
Barium (Ba)	mg/kg	<0.1	<0.1	<0.1	8.4



Beryllium (Be)	mg/kg	<0.001	<0.001	<0.001	0.07
Cadmium (Cd)	mg/kg	<0.001	<0.001	<0.001	0.035
Lead (Pb)	mg/kg	<0.002	<0.002	<0.002	0.07
Lithium (Li)	mg/kg	<0.01	<0.01	<0.01	0.336
Mercury (Hg)	mg/kg	<0.0004	<0.0004	<0.0004	0.021
Thallium (Tl)	mg/kg	<0.00005	<0.00005	<0.00005	0.0007
<b>Conclusion</b>	-	-	-	PASS	-

Parameter	Unit	Result		Maximum Specific Release Limit(s) (SRLs) <sup>[a]</sup>
		2		
		3rd Migrate		
Filling volume	cm <sup>3</sup>	420		-
Volume of stimulant used	mL	280		-
Aluminum (Al)	mg/kg	<0.1		5
Antimony (Sb)	mg/kg	<0.004		0.04
Chromium (Cr)	mg/kg	<0.1		0.25
Cobalt (Co)	mg/kg	<0.005		0.02
Copper (Cu)	mg/kg	<0.5		4
Iron (Fe)	mg/kg	<5		40
Magnesium (Mg)	mg/kg	<0.5		-
Manganese (Mn)	mg/kg	<0.1		1.8
Molybdenum (Mo)	mg/kg	<0.01		0.12
Nickel (Ni)	mg/kg	<0.02		0.14
Silver (Ag)	mg/kg	<0.01		0.08
Tin (Sn)	mg/kg	<5		100
Titanium (Ti)	mg/kg	<0.5		-
Vanadium (V)	mg/kg	<0.002		0.01
Zinc (Zn)	mg/kg	<1		5
Arsenic (As)	mg/kg	<0.001		0.002
Barium (Ba)	mg/kg	<0.1		1.2
Beryllium (Be)	mg/kg	<0.001		0.01
Cadmium (Cd)	mg/kg	<0.001		0.005
Lead (Pb)	mg/kg	<0.002		0.01
Lithium (Li)	mg/kg	<0.01		0.048
Mercury (Hg)	mg/kg	<0.0004		0.003
Thallium (Tl)	mg/kg	<0.00005		0.0001
<b>Conclusion</b>	-	PASS		-

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: With reference to Metals and Alloys used in Food Contact Materials and articles - A Practical Guide to Manufacturers and Regulators (2013 1st Edition) published by European Directorate for the Quality of Medicines and HealthCare (EDQM), Chapter 3.

Remark: 1) <sup>[a]</sup> denotes as this (these) maximum specific release limit(s) was (were) referenced from Metals and Alloys used in Food Contact Materials and articles - A Practical Guide to Manufacturers and Regulators (2013 1st Edition) published by European Directorate for the Quality of Medicines and HealthCare (EDQM), Chapter 1, Article 4, Tables 1 and 2.  
2) Appropriate test condition(s) was (were) selected according to Guidelines on Testing Conditions for Articles in Contact with Foodstuffs (With a Focus on Kitchenware) (2009 1st Edition) published by European Commission Joint Research Center (JRC).



- 3) Artificial tap water was prepared according to German Standard DIN 10531: 2011-06.  
4) <sup>[b]</sup> denotes as the sum of the results of the first and second migrates should not be exceed seven times the SRL

**Specific Migration of 2,2,4,4-Tetramethyl-1,3-cyclobutanediol(TMCD) for Plastic Materials in Contact with Foodstuffs – Commission Regulation (EU) No. 10/2011 and Its Amendments**

Test Condition: 2 h at 70 °C (3% Acetic acid)

Parameter	Simulant Used	Unit	Result			Maximum Allowable Limit(3 <sup>rd</sup> )
			1			
			1st Migrate	2nd Migrate	3rd Migrate	
Food contact surface area	-	dm <sup>2</sup>	0.60			-
Volume of simulant used	-	mL	100			-
2,2,4,4-Tetramethyl-1,3-cyclobutanediol(TMCD)	3% Acetic acid	mg/kg	<2.5	<2.5	<2.5	5
<b>Conclusion</b>	-	-	PASS			-

Parameter	Simulant Used	Unit	Result			Maximum Allowable Limit(3 <sup>rd</sup> )
			3			
			1st Migrate	2nd Migrate	3rd Migrate	
Food contact surface area	-	dm <sup>2</sup>	0.60			-
Volume of simulant used	-	mL	100			-
2,2,4,4-Tetramethyl-1,3-cyclobutanediol(TMCD)	3% Acetic acid	mg/kg	<2.5	<2.5	<2.5	5
<b>Conclusion</b>	-	-	PASS			-

Note: “<” = less than  
mg/kg = milligram per kilogram

Method: EN 13130-1: 2004 and analysis by Gas Chromatograph Mass Spectrometer (GC-MS).

Remark: 1) The migration test is carried out according to EU regulation No. 10/2011 and the corresponding regulatory statutes.

2) For article intended for repeated use, the migration tests are carried out three times on the same test sample.







**Bisphenol A (BPA) Content & As Applicant's requirement**

Test Method: Sample was extracted with organic solvent and then analyzed by Liquid Chromatograph Tandem Mass Spectrometer.

Parameter	Unit	MDL	Result			Client's Limit
			1	3	4	
Bisphenol A (BPA)	mg/kg	0.1	ND	ND	ND	0.1
<b>Conclusion</b>	-	-	PASS	PASS	PASS	-

Note / Key:

ND = Not Detected

mg/kg = milligram per kilogram

MDL = Method Detection Limit

**Bisphenol A Contents for Materials in Contact with Foodstuffs – French Loi 2012-1442**

Parameter	Unit	Result			Maximum Allowable Limit
		1	3	4	
Bisphenol A	mg/kg	<0.1	<0.1	<0.1	Not Detected (<0.1)
<b>Conclusion</b>	-	PASS	PASS	PASS	-

Note:

“<” = less than

mg/kg = milligram per kilogram

Method: Solvent extraction and analysis by Liquid Chromatograph Mass Spectrometer (LC-MS).

END