

MONITORING ID: 23-0220614

Monitored Party PUJIANG BAOER LOCKS FACTORY CO., LTD.	amfori ID 156-010512-000	Address No.66, Baoer Road, Pujiang Economic Development Zone, Pujiang County,, 322200 Jinhua, Zhejiang Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner ABS Quality Evaluations Inc.
Monitoring Start Date 02/11/2023	Closing Meeting Finished Date 14/11/2023	Submission Date 14/11/2023
Expiration Date 14/11/2024	Announcement Type Fully Announced	
Site PUJIANG BAOER LOCKS FACTORY CO., LTD.	Site amfori ID 156-010512-002	

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OVERALL RATING



SECTION RATING

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

PA 6: Decent Working Hours	D	
PA 7: Occupational Health and Safety	A	
PA 8: No Child Labour	A	
PA 9: Special Protection for Young Workers	A	
PA 10: No Precarious Employment	A	
PA 11: No Bonded, Forced Labour or Human Trafficking	A	
PA 12: Protection of the Environment	A	
PA 13: Ethical Business Behaviour	A	

GENERAL DESCRIPTION

Name of lead auditor: Claire Ma; APSCA membership number: CSCA21703851

Name of team auditor (if applicable): NA

Name of observers, translators, trainees, advisors/consultants (if applicable): NA

Monitoring partner name: ABS Quality Evaluations Inc.

Audit schedule details: The fully announced full audit is planned for 1 auditor x 1.0 day on 2 Nov. 2023.

Business partner information: PUJIANG BAOER LOCKS FACTORY CO., LTD. (浦江宝儿制锁有限公司 91330726350130139Q) was located at No.66, Baoer Road, Pujiang Economic Development Zone, Pujiang County, Jinhua, Zhejiang, China (中国浙江省金华市浦江县浦江县经济开发区保尔路66号). The auditor verified the business license with the address, legal entity representative, business scope, and other information according to website <http://www.gsxt.gov.cn/> (National Enterprise Credit Information Publicity System). The local name was the same as above. The address on the business license was No.66, Baoer Road, Pujiang County, Zhejiang (浙江省浦江县保尔路66号), which was exactly the same place as the address on the platform. The address on the platform was more detailed. The auditee was a limited company, established on 4 Aug. 2015, valid to 3 Aug. 2035. The auditee was specialized in the manufacturing pin lock and disc lock. The main production activity included cutting, drilling, polishing, paint spraying, assembly and packing. No process / service / product was subcontracted. No obvious peak season was observed in the auditee.

Audited location information:

The auditee currently rented the 5th floor of one 6-storey office building and one 4-storey production building (partial with 5 floors) from Pujiang O Hardware Co., Ltd (浦江五金有限公司) with the total construction areas of approximately 5,884 square meters. The rental agreement and the business of the lessor were provided for review. The 5th floor of the 6-storey office building was used as office rooms by the auditee and the other floors of the building were used as office rooms by the lessor; for the 4-storey production building (partial with 5 floors), the 1st floor was used as cutting, drilling and polishing workshops, the 2nd floor was used as polishing and paint spraying, the 3rd floor was used as assembly and packing workshop and finished-goods warehouse, the 4th floor was used as accessory and material warehouses, and the partial 5th floor was used as the platform for the cargo lift. As per the onsite observation and workers' interview, there were no dormitory, kitchen and canteen provided by the auditee and other buildings were rented out to other companies by the lessor. The evacuation stairs in the office building were shared, but maintained well by the auditee. No shared process, equipment, personnel or other area was detected.

Operating shifts and hours: The policy and interview information showed that the regular workdays were from Monday to Friday with 8 hours per day, 5 days per week. All employees ran 1 shift: 7:30-11:30, 13:00-17:00. 5 samples' payroll from Oct. 2022 to Sep. 2023 and time records since Oct. 2022 were selected for verification. Based on the sampled workers' payroll and attendance records in Dec. 2022, May 2023 and Sep. 2023, it was noted that the workers' maximum overtime hours were 2 hours a weekday, 8 hours a rest day, 0 hours a holiday, 16 hours a week and 66 hours a month. The longest consecutive working days were 6 days.

Time recording system: The factory used swiping time machine to register workers' attendance status.

Salary payment details: All workers were paid at a monthly rate before/on the 30th of next month by cash. The minimum wage of the sampled workers was RMB3000 per month, which was no less than the local legal minimum wage standard (i.e. RMB1840 per month or RMB 10.57 per hour since Aug. 2021). All were paid 150% and 200% of normal wage for the overtime working on weekday and rest day respectively. The auditee provided social insurance records from Oct. 2022 to Sep 2023. Based on the records in Sep. 2023, there were 45 workers in the auditee, including 7 retirees, no new worker, temporary or dispatched workers, the auditee only provided retirement / unemployment / medical / maternity insurance for 18 out of 38 workers (Coverage: 47.37%) and provided accident insurance for all 45 workers (coverage: 100%). Commercial injury insurance was not provided. No waiver was provided by the factory.

Worker number information: There were 30 male employees and 15 female employees, including 37 production workers (25 males and 12 females) and 8 non-production workers. All employees were mainland Chinese, 35 migrant workers were from other provinces of China. There was no vulnerable worker or any other special group workers (interns, apprentices, contractor workers etc.)

Good practices: The auditee paid the personnel part of the social insurance for workers.

Worker organization details: No trade union, collective bargaining agreements and waiver were applicable currently. Worker representative was elected in the auditee.

The special circumstances can be classified as followed: no special circumstance happened during the audit. All the findings were discussed with the management in the closing meeting. The factory signed the onsite finding report. The auditor reminded the factory that they should submit the Remediation Plan into the BSCI Platform within 60 days. The management was receptive of all the findings and gave the willingness to take appropriate corrective actions.

Summary of findings: The performance areas needed improvement were PA1, PA2, PA5, PA6, PA7

Living wage calculation: Please see Remuneration and Working Hours for details.

Precautions taken about #COVID-19 in the facility: The auditee was located at a low Covid-19 risk area now. Disinfection was conducted in the workplace every day. Training and risk assessment of Covid-19 were also conducted.

Remark:

1. The Personal Information Protection Act was issued in China and implemented since 1 November 2021. The auditor had mosaicked the personal information related to attached documents on BSCI platform.
2. There are no agencies or contractor used by the auditee, which makes the agency labor contract or contractor license/ permit not applicable. Moreover, no collective bargaining agreements and waiver were applicable currently.
3. Employees who had reached retired age under certain age (less than 65 years old) could be enrolled in accident insurance in the Zhejiang province.
4. Paint spraying process was not started during the audit, the operator was helping in the packing workshop.

SITE DETAILS

Site
**PUJIANG BAOER LOCKS
FACTORY CO., LTD.**

Site amfori ID
156-010512-002

GICS Classification

Sector
Industrials

Industry Group
**Commercial & Professional
Services**

Industry
Commercial Services & Supplies

Sub Industry
**Environmental & Facilities
Services**

amfori Process Classifications

Assembly (general)
Bending / Punching
Buffing / Sand paper polishing / Mechanical polishing
Cutting
Packaging / Packing and shipping
Painting (spraying / rolling / dipping / brushing /
printing)

NACE Classification

N.A.

GS1 Classifications

N.A.

Water Stress Situation

This site is not located in a water stressed region

METRICS

Key Metrics

Total workforce	45	Workers
Legal minimum wage in local currency	1,840	Monthly
Lowest wage paid for regular work at the site	3,000	Monthly
Calculated living wage in local currency	4,646.91	Monthly
Total sample	5	Workers

Other Metrics

Male workers	30	Workers
Female workers	15	Workers
Non-binary workers	0	Workers
Permanent workers - Male	30	Workers
Permanent workers - Female	15	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	5	Workers
Management - Female	3	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	23	Workers
Domestic migrant workers - Female	12	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	30	Workers
Workers hired directly - Female	15	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	3	Workers
Sample - Female	2	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: PUJIANG BAOER LOCKS FACTORY CO., LTD. | Site amfori ID: 156-010512-002

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, onsite tour, document review, worker/worker representative interview, the auditee had established written policy and procedure regarding BSCI management, but it did not implement effectively, also had non-conformance found in some PAs. (Working hours, HS issue, etc). This question is rated as partially because not all PAs had findings.	根据管理层访谈，文件审核，现场审核，员工/员工代表访谈，发现被审核方已经建立了关于BSCI管理的书面的政策和程序，但是没有有效的实施，比如有些PA仍然有不合规发现（工时、健康安全等）。该问题判为部分不符合，因为不是所有PA都存在问题点。

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, document review, worker/worker representative interview, The auditee had established the workforce analyze procedure and calculated the production capacity data but didn't have workforce capacity planning which led workers' OT exceeded legal limits. This question is rated as partially because the auditee established the production capacity calculation procedure.	根据管理层访谈，文件审核，员工/员工代表访谈，发现被审核方建立了产能分析程序并计算了生产能力数据，但未进行产能规划以致于员工加班超过法规要求。该问题判为部分不符合，因为被审核方建立了产能评估程序。



PA 2: Workers Involvement and Protection

Site: PUJIANG BAOER LOCKS FACTORY CO., LTD. | Site amfori ID: 156-010512-002

Question: 2.4 Is there satisfactory evidence that the auditee builds sufficient competence among managers, workers and workers representatives to successfully embed responsible practices in the business operation?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, document	根据管理层访谈，文件审核，员工/员工代表访谈，

Finding	
review, worker/worker representative interview, the auditee provided the amfori BSCI training for all workers but no mechanism to evaluate the training effect. According to worker interview, 2/5 interviewed workers didn't know the requirement of amfori BSCI. This question is rated as partially because the auditee provided the amfori BSCI training for all workers.	被审核方给所有员工提供了amfori BSCI的培训，但没有验证培训效果的机制。根据员工访谈，2/5被访谈的员工不清楚amfori BSCI的要求。该问题判为部分不符合，因为被审核方给所有员工提供了amfori BSCI的培训。

PA 5: Fair Remuneration

Site: PUJIANG BAOER LOCKS FACTORY CO., LTD. | Site amfori ID: 156-010512-002

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, document review, worker/worker representative interview, the auditee established the decent living wage procedure and accessed the local decent living wage, but the basic wages paid for 5 sampled workers (RMB3000-3100 per month) was more than legal minimum wage, but less than the local decent living wage of RMB4646.91 per month. This question is rated as partially because the auditee had a basic idea of living wage.	根据管理层访谈，文件审核，员工/员工代表访谈，审核发现被审核方建立了体面生活需求工资的程序并核算了当地体面生活需求工资，但是被审核方支付给5名抽样的基本工资3000-3100元/月高于当地法定最低工资，但是低于当地体面基本生活需求工资的每月4646.91元。该问题判为部分不符合，因为被审核方在体面工资方面有一定概念。

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, document review, worker/worker representative interview, the auditee did not provide social insurance as per legal requirement. The auditee provided social insurance records from Oct. 2022 to Sep 2023. Based on the records in Sep. 2023, there were 45 workers in the auditee, including 7 retirees, no new worker, temporary or dispatched workers, the auditee only provided retirement / unemployment / medical / maternity insurance for 18 out of 38 workers (Coverage: 47.37%) and provided accident	根据管理层访谈，文件审核，员工/员工代表访谈，被审核方未按照法规要求提供社保。被审核方提供了2022年10月至2023年9月的社保记录。根据2023年9月的记录，被审核方有45名员工，包含7名退休员工，没有新员工，临时工，劳务派遣员工，被审核方给38名员工中的18人提供养老/失业/医疗/生育保险(覆盖率 = 47.37%)，给所有45人提供了工伤保险(覆盖率100%)。管理者代表和被访谈员工解释，工人不愿意购买社会保险。被审核方未给员工提供商业险。被审核方未获得任何批文。该问题判为部分不符合，因为工伤保险覆盖比例达到100%。

Finding	
insurance for all 45 workers (coverage: 100%). The management representative and interviewed workers explained that the worker didn't want to get the social insurance. Commercial injury insurance was not provided. No waiver was provided by the factory. This question is rated as partially because accident insurance coverage rate was 100%. Reference law: PRC Labor Law article 72 & article 73.	参考法规：《中华人民共和国劳动法》第72条和73条。

PA 6: Decent Working Hours

Site: PUJIANG BAOER LOCKS FACTORY CO., LTD. | Site amfori ID: 156-010512-002

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, onsite tour, document review, worker/worker representative interview, the auditee's working hours management system did not work effectively since they did not measure and take actions to control excessive working hours. The payrolls from Oct. 2022 to Sep. 2023 and the working time records from Oct. 2022 to the audit day were provided by the auditee. 5 sampled workers' time records in Dec. 2022, May 2023 and Sep. 2023 showed that the monthly overtime hours exceeded 36 hours in May 2023 and Sep. 2023, which were 66 hours in Sep. 2023 and 64 hours in May 2023. This question is rated as no because all sampled workers' overtime hours had exceeded the legal overtime limit. Reference law: PRC Labour Law article 41.	根据管理层访谈，现场审核，文件审核，员工/员工代表访谈，被审核方没有衡量和采取措施来控制超时，导致工时管理系统并未有效运行。被审核方提供2022年10月至审核当天的考勤以及2022年10月至2023年9月的工资。根据抽样5名员工在2022年12月，2023年5月和9月的考勤，月加班在2023年9月和2023年5月超过法规要求的36小时，加班时间再2023年9月为66小时，在2023年5月为64小时。该问题判为不符合，因为所有员工加班时间都超过了法定限制。参考法律法规：《中华人民共和国劳动法》第41条。

PA 7: Occupational Health and Safety

Site: PUJIANG BAOER LOCKS FACTORY CO., LTD. | Site amfori ID: 156-010512-002

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

ENGLISH	LOCAL LANGUAGE
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Finding	
Based on the management interview, onsite tour, document review, worker/worker representative interview, H&S management system was not fully implemented since there were findings found in this audit. This question is rated as partially because the auditee did well in some respects.	根据管理层访谈，文件审核，现场审核，员工/员工代表访谈，发现工厂的职业健康安全管理体系未能完全执行，因为本次审核仍有不符合项发现。该问题被判为部分不符合，因为被审核方在某些方面做的较好。

Question: 7.6 Is there satisfactory evidence that the auditee enforces the use of PPE to provide protection to workers alongside other controls and safety systems?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, worker interview, onsite tour, 7 polishing workers (contact with noise and dust) were wearing one-off masks instead of anti-dust masks during operation. This question is rated as partially because other relevant PPEs, such as earplugs, goggle, etc were provided to workers. (Reference law/regulation: Article 45 of Law of the People's Republic of China on Production Safety)	根据管理层访谈，员工访谈，现场走访，7名抛光员工（接触粉尘和噪音）在操作时仅佩戴了一次型口罩，而非防尘口罩。该问题被判为部分不符合，因为被审核方提供了其他相关劳防用品，例如耳塞，防护眼镜等。（参考法律法规：《中华人民共和国安全生产法》第45条）

Question: 7.13 Is there satisfactory evidence that the auditee makes sure a competent person periodically checks the electrical installations and equipment?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, document review, onsite tour, 100% electrical boxes in the auditee were not installed with inner safety protective covers and unlocked. This question is rated as no because all electric cabinets did not meet relevant requirements. (Reference law/regulation: Article 5.1.2 of the General Guide for Safety of Electric User GB/T13869-2017)	根据管理层访谈，文件审核，现场走访，审核发现被审核方100%的电箱没有安装内部绝缘保护罩且没有上锁。该问题判为不符合，因为所有电箱不符合要求。（参考法律法规：《用电安全导则GB/T13869-2017》第5.1.2条）

Question: 7.25 Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination are adequate for the health and safety of workers?

ENGLISH	LOCAL LANGUAGE
Finding	
Based on the management interview, onsite tour, worker interview, 20% goods in the warehouse	根据管理层访谈，现场审核，员工访谈，仓库内20%货品靠墙靠柱堆放。管理人员和员工表示，对于材

Finding

were stored against the wall and pillar. The management staff and workers revealed that the site was crowded to store the materials and goods. This question is rated as partially because not all materials were placed against walls and pillars. Reference law: Article 18 of Rules for Warehouse Fire Prevention Safety Management.

料和货物来说，场地有些拥挤了。该问题被判为部分不符合，因为不是所有材料都靠墙靠柱放。参考法规：《仓库防火安全管理规则》第18条。