



# Validated Audit Report

Audit Reference Number	VAR-20220505-CN-01A01-7
Audited Facility	HUAJUNG ELECTRONICS(GUANG DONG)CO.,LTD
Audit Date	05/05/2022
Overall Audit Score	86.5
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## Conformance Results

Overall Score	Conformance	Risk of NC	Minor NC	Major NC	Priority NC	Opportunity for Improvement	Total Scored Questions	Not Applicable Questions
86.5	65	0	0	14	1	0	80	0

\*NC= Non-conformance to RBA Code of Conduct

Audit Information	
Audit ID	G-AU-10006908
Audit Reference Number	VAR-20220505-CN-01A01-7
QC Completed Date	05/21/2022
Audit Start Date	05/05/2022
Closing Meeting Date	05/06/2022
Audit Type	Initial Audit
Audit Firm	SGS
Audit Category	VAP
Auditor	Auditor-633 Auditor-642

Facility Information	
Company Name	HUAJUNG COMPONENTS CO.,LTD
Facility Name	HUAJUNG ELECTRONICS(GUANG DONG)CO.,LTD
RBA Facility ID	G-FA-10008359
Facility Address	NO.104,Ke Ji Dong Road,Shijie,DongGuang.Guang Dong.China
Facility Country	China
Facility Point Of Contact	icp2@huajung.com
Total Number Of Workers	350

## Executive Summary

The Validated initial audit of HUA JUNG ELECTRONICS (GUANG DONG) CO., LTD. is evaluated the facility's labor, ethics, occupational health & safety, environmental practices, and supporting management systems against the requirements of the RBA Code 7.0.1, relevant local rules and regulations, national legislation. The audit is performed during May 5, 2022 to May 6, 2022. The duration is 3-person days for 2 auditors. No integrity issues are encountered during the audit. The Workforce Composition Survey was not received according to management interview. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. There are 1 priority non-compliance and 14 major non-compliances identified by the audit team. Summary of Priority Finding: Health and Safety: B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters. Summary of Major Findings: Labor: A3.1: Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production

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area, by nationality and job function. A3.2: Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. A3.3: The Policy and procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours. However, the working hours controls are found to be in non-conformance of workers' overtime hours and weekly working hours, one day off per 7 are not in line with legal and RBA requirements. The highest weekly working hours are 62 hours/ workweek, the highest overtime hours are 4 hours/ day and 104 hours/ month, the longest consecutive working days are 12 days worked. A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. Health and Safety: B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#. B1.3 Personal Protective Equipment (PPE) are required to control health & safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&B(Axial&Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#. B3.1 Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards. B4.1 Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors. B6.2 A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A. B7.1 Required health & safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings. B7.2 Dormitories are clean, safe and well maintained and most facilities meet international housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings. Environmental: C3.1 Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.

### Audit Score by Section

Section	Section Score	Conformance	Risk of NC	Minor of NC	Major of NC	Priority of NC	Opportunity for Improvement	Total scored questions	Non applicable questions
A) Labor	126.0	18	0	0	6	0	0	24	0
B) Health & Safety	79.3	14	0	0	7	1	0	22	0
C) Environment	177.8	10	0	0	1	0	0	11	0
D) Ethics	200.0	8	0	0	0	0	0	8	0
E) Mgt. System	200.0	15	0	0	0	0	0	15	0

### Non-conformance Findings Details

Question #	VAP-A3.1
Subsection Name	WORKING HOURS
Question Text	Hours worked in a workweek over the last 12 months does not exceed 60 hours
Rating	Major Non-Conformance

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Conclusion	Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 41 /中华人民共和国劳动法（2018修正）第四十一条 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, 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 laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours. / 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。]
Question #	VAP-A3.2
Subsection Name	WORKING HOURS
Question Text	Workers receive at least one (1) day off every seven (7) days
Rating	Major Non-Conformance
Conclusion	Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 38 /中华人民共和国劳动法（2018修正）第三十八条The employing unit shall guarantee that its staff and workers have at least one day off in a week. / 用人单位应当保证劳动者每周至少休息一日。]
Question #	VAP-A3.3
Subsection Name	WORKING HOURS
Question Text	Adequate and effective policy and system/procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours
Rating	Major Non-Conformance
Conclusion	The Policy and procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours. However, the working hours controls are found to be in non-conformance of workers' overtime hours and weekly working hours, one day off per 7 are not in line with legal and RBA requirements. The highest weekly working hours are 62 hours/ workweek, the highest overtime hours are 4 hours/ day and 104 hours/ month, the longest consecutive working days are 12 days worked.
Question #	VAP-A3.4
Subsection Name	WORKING HOURS
Question Text	Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave

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Rating	Major Non-Conformance
Conclusion	Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. [Regulations on Paid Annual Leave for Employees (2007), Article 3 / 职工带薪年休假条例 (2007) 第三条 Where an employee has served one full year but less than 10 years accumulatively, he is entitled to five days of annual leave. If he has served 10 full years but less than 20 years, annual leave is 10 days. If he has served for 20 full years, annual leave is 15 days. / 职工累计工作已满1年不满10年的, 年休假5天; 已满10年不满20年的, 年休假10天; 已满20年的, 年休假15天。]
Question #	VAP-A4.2
Subsection Name	WAGES AND BENEFITS
Question Text	For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed.
Rating	Major Non-Conformance
Conclusion	For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). [Regulation on the Payment of Wages in Guangdong Province (2016 Amendment), Article 13 / 广东省工资支付条例 (2016修正) 第十三条 If the labor relationship between the employer and the laborer is discharged or terminated in accordance with the law, wages shall be paid to laborers in full at once on the date when the labor relation is terminated or discharged. / 用人单位与劳动者依法终止或者解除劳动合同关系的, 应当在终止或者解除劳动合同关系当日结清并一次性支付劳动者工资。]
Question #	VAP-A4.4b
Subsection Name	WAGES AND BENEFITS
Question Text	Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame
Rating	Major Non-Conformance
Conclusion	Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. [Regulation on the Administration of Housing Provident Fund (revised in 2002)/住房公积金管理条例 (2002修订) Housing Provident Fund regulations apply to the workers in all geographic regions of the country, whether they are migrant workers registered elsewhere or residential workers registered in the city where they are working. Article 15 Units shall register employee's information in housing provident fund management center since employee joins the units, set housing provident fund account for employee in the entrusted bank with the approved documents from housing provident fund center. Article 16 Contributions both for employee and unit must be calculated based on each worker's average monthly wage over the last year. Article 18 Different regions may establish variable housing provident fund rates, as decided by local governments, but contributions may not fall below a minimum of five percent (5%) of the monthly wage. / 第十五条单位录用职工的, 应当自录用之日起30日内到住房公积金管理中心办理缴存登记, 并持住房公积金管理中心的审核文件, 到受委托银行办理职工住房公积金账户的设立或者转移手续。第十六条职工住房公积金的月缴存额为职工本人上一年度月平均工资乘以职工住房公积金缴存比例。单位为职工缴存的住房公积金的月缴存额为职工本人上一年度月平均工资乘以单位住房公积金缴存比例。第十八条职工和单位住房公积金的缴存比例均不得低于职工上一年度月平均工资的5%; 有条件的城市, 可以适当提高缴存比例。具体缴存比例由住房公积金管理委员会拟订, 经本级人民政府审核后, 报省、自治区、直辖市人民政府批准]
Question #	VAP-B1.2
Subsection Name	OCCUPATIONAL SAFETY
Question Text	Potential for worker exposure to health & safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) identified, assessed and mitigated using the Hierarchy of Controls.
Rating	Major Non-Conformance

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Conclusion	<p>Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>[Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 24/危险化学品安全管理条例 (2013修订) 第二十四条. Hazardous chemicals shall be stored at designated warehouses, sites or store rooms and managed by designated persons./ 危险化学品应当储存在专用仓库、专用场地或者专用储存室内, 并由专人负责管理 ;]</p>
Question #	VAP-B1.3b
Subsection Name	OCCUPATIONAL SAFETY
Question Text	Appropriate Personal Protective Equipment (PPE) is consistently and correctly used where required to control health & safety hazards and worker exposure
Rating	Major Non-Conformance
Conclusion	<p>Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.</p> <p>[Production Safety Law of the People's Republic of China (2014 Amendment), Article 42/中华人民共和国安全生产法 (2014修正) 第四十二条. A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules./ 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。]</p>
Question #	VAP-B2.4
Subsection Name	EMERGENCY PREPAREDNESS
Question Text	Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained
Rating	Priority Non-Conformance
Conclusion	<p>Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&amp;B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters. No containment action from factory.</p> <p>[Fire Prevention Law of the People's Republic of China (2019 Amendment), Article 16/中华人民共和国消防法 (2019修正) 第十六条 Organs, social groups, enterprises, public institutions and other entities shall perform the following fire safety duties: 4. to ensure that the evacuation passages, safety exits and fire truck passages are clear and the fire and smoke compartmentation and fire separation distance meet the relevant fire protection technical standards; 机关、团体、企业、事业等单位应当履行下列消防安全职责: (四) 保障疏散通道、安全出口、消防车通道畅通, 保证防火防烟分区、防火间距符合消防技术标准 ;]</p>
Question #	VAP-B3.1b
Subsection Name	OCCUPATIONAL INJURY AND ILLNESS

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Question Text	All required permits, programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Major Non-Conformance
Conclusion	Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards. [Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35/中华人民共和国职业病防治法（2018修正）第三十五条。 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results./ 对从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。]
Question #	VAP-B4.1b
Subsection Name	INDUSTRIAL HYGIENE
Question Text	All required permits, licenses and testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Major Non-Conformance
Conclusion	Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. No permit and license is required by local law. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors. [Provisions on the Supervision and Administration of Occupational Health at Work Sites (2012), Article 20/工作场所职业卫生监督管理规定（2012）第二十条 The employer with serious occupational disease hazards shall entrust the accredited occupational health technical service institutions to conduct present situation assessment of occupational disease hazards once every three years at least besides meet the previous article./ 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。]
Question #	VAP-B6.2b
Subsection Name	MACHINE SAFEGUARDING
Question Text	An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely
Rating	Major Non-Conformance
Conclusion	A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A#. [General Rules of Design on Health and Safety of Production Facility (GB 5083-1999), article 6.1.2/生产设备安全卫生设计总则（GB 5083-1999）第6.1.2条 Necessary safeguard shall be installed for all moving parts that are accessible to the operator during machine operation./ 对操作人员在设备运行时可能触及的可动零部件，必须配置必要的安全防护装置。]
Question #	VAP-B7.1b
Subsection Name	FOOD, SANITATION AND HOUSING
Question Text	All required health & safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times
Rating	Major Non-Conformance

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Conclusion	<p>Required health &amp; safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings.</p> <p>[Provisions on the Supervision and Administration of Fire Protection of Construction Projects (2012 Revision), Article 13/建设工程消防监督管理规定 (2012修订) 第十三条 For a people-intensive premise under one of the following circumstances, the construction unit thereof shall apply to the fire protection division of the public security organ for the fire protection design review, and shall apply for a fire protection as-built acceptance to the fire protection division of the public security organ which has issued the fire protection design review opinions after the completion of the construction project.(5) It is...the staff collective dormitory of a labor-intensive enterprise with the total construction area of more than 1,000 square meters./ 对具有下列情形之一的人员密集场所, 建设单位应当向公安机关消防机构申请消防设计审核, 并在建设工程竣工后向出具消防设计审核意见的公安机关消防机构申请消防验收: (五) 建筑总面积大于一千平方米的.....劳动密集型企业的员工集体宿舍;</p> <p>Administrative Measures for Protecting against and Mitigating Thunder and Lightning Disasters (2013 Amendment), Article 19/防雷减灾管理办法 (2013修改) 第十九条. After being put into use, a regular inspection system shall be established for the thunder protection devices. Thunder protection devices shall be tested once a year./ 投入使用后的防雷装置实行定期检测制度。防雷装置应当每年检测一次。]</p>
Question #	VAP-B7.2b
Subsection Name	FOOD, SANITATION AND HOUSING
Question Text	Dormitories are clean, safe, well maintained, and meet international housing standards
Rating	Major Non-Conformance
Conclusion	<p>Dormitories are clean, safe and well maintained and most facilities meet housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5/建筑设计防火规范 (GB 50016-2014, 2018修正) 第10.3.5条 Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements:1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place./ 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; ]</p>
Question #	VAP-C3.1b
Subsection Name	HAZARDOUS SUBSTANCES
Question Text	Hazardous substances including wastes are properly categorized, labeled, handled, stored, transported and disposed using government-approved and/or licensed vendors
Rating	Major Non-Conformance

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Conclusion	<p>Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment), Article 3.6.12/建筑设计防火规范 (GB 50016-2014, 2018修正) 3.6.12 Facilities capable of preventing liquids from flooding and spreading shall be provided in storage storing Class A, B and C liquids. Stores of items that are subject to fire and explosion in case of damp shall be protected against water immersion./ 甲、乙、丙类液体仓库应设置防止液体流散的设施。遇湿会发生燃烧爆炸的物品仓库应采取防止水浸渍的措施。</p> <p>Standard on Pollution Control of Hazardous Waste Storage (GB 18597-2001 / XG 1-2013), Article 6.3.9/危险废物贮存污染控制标准 (GB 18597-2001 / XG 1-2013) 6.3.9 Hazardous waste storage shall be wind-proof, rain-proof and sun-proof./ 危险废物堆要防风、防雨、防晒。]</p>
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### Full Listing of Questionnaire Results

A) Labor	
FREELY CHOSEN EMPLOYMENT	
Question #	VAP-A1.1
Question Text	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not permitted.
Rating	Conformance
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage) trafficked or slave labor is not permitted. No foreign migrant worker is used in the facility.
Data points	<ul style="list-style-type: none"> <li>* Record review: 20 out of 20 Personnel files reveal that no fees or penalties are implemented.</li> <li>* Record review: 20 out of 20 workers employment contracts reveal a) no type of forced, exploitative prison, indenture, bonded, trafficked or slave labor is used b) no fees implemented.</li> <li>* Record review: 20 out of 20 payroll records in each month of the period May 2020 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) reveal a) no form of non-voluntary labor or fees b) no personal loans c) no education loans.</li> <li>* Record review: 20 out of 20 working hour records in each month of the period May 2020 to March 2022 reveal no form of non-voluntary labor.</li> <li>* Record review: 5 out of 5 grievance records covering the period May 2020 to April 2022 reveal no form of non-voluntary labor.</li> <li>* Management interview: Management Department Manager a) states no deposit or retention of salary is done b) confirms workers can quit their job upon legal notice period, and workers are free to leave Auditee after work c) states workers are informed about the "No penalty" details of worker voluntary employment termination d) confirms no fees implemented e) states no personal loans and there is no education loan f) confirms no foreign migrant worker is working in the facility.</li> <li>* Worker interview: 20 out of 20 workers a) detail the steps how they got this job b) confirm terminating employment is voluntary with no explicit threat of punishment, fines, violence, or withholding wages c) state they paid no prohibited Fees before any commitment was made d) confirm no allowable Fees e) state no deductions are made from monthly wages to repay a loan f) confirm no foreign migrant worker is working in the facility.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A1.2
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.
Rating	Conformance
Conclusion	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is not permitted.

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Data points	<ul style="list-style-type: none"> <li>* Record review: Employee Recruitment Control Procedure (Doc. No.: A-03-010-M0C0000, Rev.: 13, Issue date: December 10, 2021) reveals a) no personal loans b) no education loans.</li> <li>* Record review: Forbid Forced Labor Management Procedure (Doc. No.: A-03-065-M0C0000, Rev.: 1, Issue date: October 16, 2021) reveals a) no forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor is permitted b) workers are not required to pay Fees, deposits or incur debt as part of the employment c) when employment has been terminated voluntarily or involuntarily the worker will be paid appropriate amounts for all hours worked d) the method of monitoring of conformance with policy.</li> <li>* Record review: No foreign migrant worker is available.</li> <li>* Record review: No Labor Agents or Labor Contractors are used by the facility.</li> <li>* Record review: 2 out of 2 monitoring reports covering the period May 2020 to April 2022 demonstrate monitoring of conformance with policy.</li> <li>* Record Review: No corrective action plans as there are no non-conformances with relate to no forced, bonded (including debt bondage), involuntary or exploitative prison, trafficked or slave labor.</li> <li>* Management interview: Management Department Manager a) states the detail of the no forced, bonded, involuntary or exploitative prison, trafficked or slave labor policy and procedures b) confirms no labor Agent is used c) states contracts have agreement requirements to ensure conformance with the policies and procedures d) details how they monitor adherence to the policy and what corrective action they have made if needed e) confirms no foreign migrant in the facility.</li> <li>* Worker interview: 20 out of 20 workers confirm what no forced, bonded, involuntary or exploitative prison, trafficked or slave labor means and confirm no foreign migrant workers in the facility.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A1.3
Question Text	Terms of employment are provided in writing and in their native language prior to employment (in case of foreign migrant workers, before they leave their home country/region and no substitution or change(s) was made in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms) via employment letter/agreement/contract and explained verbally in their native language so workers understand what the terms of employment states.
Rating	Conformance
Conclusion	Terms of employment are provided in writing and in their native language prior to employment via employment contract and explained verbally in their native language so workers understand what the contract states. No foreign migrant worker is used by the facility.
Data points	<ul style="list-style-type: none"> <li>* Record review: 20 out of 20 written terms of employment in workers' native language signed prior to the date on which the worker started a) all key employment terms and conditions in their native language a.a) Nature of work a.b) Working hours, Days off and holidays a.c) Leave entitlements a.d) Benefits (housing, transportation, uniforms) a.e) What fees the worker will be charged and the amount(s) a.f) Wages and wage deductions (including all components of social insurance) and how these are calculated a.g) Other non-legally required benefits provided (pension, insurances) a.h) the terms of employment state that workers can resign without penalty.</li> <li>* Record review: The employee roster (Document number: Nil, Rev.: Nil, date: May 4, 2022) indicates that no foreign migrant worker or intern is used by the facility.</li> <li>* Record review: 20 out of 20 workers communication reports covering the period May 2021 to April 2022 demonstrate that workers are informed prior to employment of the key employment terms and conditions verbally and in writing in their native language.</li> <li>* Management interview: Management Department Manager a) states the details of the employment conditions for local workers b) confirms verbal explanation to workers of the key components of the employment conditions in a language they can understand are provided c) details what, how and when the verbal explanation to workers of the key components of the employment conditions are delivered d) states no foreign migrant worker is used.</li> <li>* Worker interview: 20 out of 20 local workers a) state when they accepted the job in writing b) confirm when they started working at the facility c) detail how they got this job including the steps the company took during recruitment and hiring d) state what the terms and conditions of their contract are e) confirm the current terms and conditions are the same as when initially informed (prior to employment) f) state when they were informed about the terms and conditions of employment g) detail how this was communicated h) state no foreign migrant worker is working in the facility.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>

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Question #	VAP-A1.4
Question Text	Upon hiring, the workers government issued identification and personal documentation originals are not held by employer/labor agent/contractor (if applicable)
Rating	Conformance
Conclusion	Upon hiring, the workers government issued identification and personal documentation originals are not held by employer. No labor agent/contractor is used by the facility.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Workers: a) show where personal documents are kept b) demonstrate control over their identity documents.</li> <li>* Record review: Employee Recruitment Control Procedure (Doc. No.: A-03-010-M0C0000, Rev.: 13, Issue date: December 10, 2021) reveals no government issued identification or personal documents originals are held or stored.</li> <li>* Record review: 20 out of 20 personnel files reveal no workers' personal documentation originals.</li> <li>* Management interview: Management Department Manager a) states the details of the procedure on holding of worker's original documents b) states the facility prohibits withholding applicant's ID card and other effective certificates, no legal requirements permit the facility to hold worker's original personal documents.</li> <li>* Worker interview: 20 out of 20 workers a) show their original personal documents b) state they need to show the original ID card and other certificates during recruiting, not require keeping it to the facility site.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A1.5
Question Text	There are no unreasonable restrictions on the movement of workers and their access to basic liberties
Rating	Conformance
Conclusion	There are no unreasonable restrictions on the movement of workers and their access to basic liberties.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Workers a) move freely when needed to access basic liberties (no systems for restriction in place no toilet passes b) are free to leave the Auditee location including workers' dormitories when not engaged in work.</li> <li>* Record review: Forbid Forced Labor Management Procedure (Doc. No.: A-03-065-M0C0000, Rev.: 1, Issue date: October 16, 2021) states the detail on freedom of movement.</li> <li>* Record review: Employee Manual (Doc. No.: A-03-041-M0C0000, Rev.: 19, Issue date: September 25, 2021) states detail on freedom of movement implementation.</li> <li>* Management interview: Management Department Manager a) states how workers can move freely within the Auditee on all basic liberties and leave the Auditee location including workers' dormitories when not engaged in work b) confirms how the company does not implement any non-coercive restriction procedures.</li> <li>* Worker interview: 20 out of 20 workers a) state there are no restrictions on movement for basic liberties and leave the Auditee location including workers' dormitories when not engaged in work b) confirm there is no usage of toilet pass, any time restriction.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>CHILD LABOR AVOIDANCE</b>	
Question #	VAP-A2.1
Question Text	Workers are not below the minimum age
Rating	Conformance
Conclusion	Workers are not below the minimum age. The youngest worker is 18 years old. No indirect workers are used by the facility.
Data points	<ul style="list-style-type: none"> <li>* Site observation: No workers on site appear to be under the minimum age.</li> <li>* Record review: 20 out of 20 personnel files reveal a) no workers on site are under the minimum age. The youngest worker is 18 years old. b) No indirect workers.</li> <li>* Management interview: Management Department Manager confirms a) the facility has not hired underage workers b) No indirect workers.</li> <li>* Worker interview: 20 out of 20 workers a) state no worker under the minimum age at the facility to their knowledge b) confirm the facility has not hired any underage employees to their knowledge c) No indirect workers.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>

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Question #	VAP-A2.2
Question Text	An adequate and effective policy and process is established to ensure that workers below the legal minimum working age are not hired either directly or indirectly via labor agencies/contractors
Rating	Conformance
Conclusion	An adequate and effective policy and process is established to ensure that workers below the legal minimum working age are not hired. No labor agent/contractor is used by the facility.
Data points	<p>* Record review: Child Labor Rescue, Young Worker and Female Worker Protection Control Procedure (Doc. No.: A-03-051-M0C0000, Rev.: 5, Issue date: September 25,2021) states a) the detail of the child labor prohibition b) the worker's job application after the "child" worker's age meets legal requirements is not refused.</p> <p>* Record review: New employee registration methods (Doc. No.: A-03-004-M0C0000, Rev.: 5, Issue date: July 6,2021) states a) the process to verify the reliability of age documents which includes visual verification of a government recognized photographic identification document b) a reliable ID verification system to control the workers' access to the facility c) a process to assist underage children found working to provide for the welfare of the child.</p> <p>* Management interview: Management Department Manager a) details of the child labor prohibition policy b) explains the minimum age verification and documentation procedures c) confirms what is done when an underage worker is discovered.</p> <p>* Worker interview: 20 out of 20 workers a) detail the child labor prohibition policy b) explain how their age is verified during the hiring process.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-A2.3a
Question Text	Some workers are under 18 years old OR a policy and implementation mechanisms are missing?
Rating	No
Conclusion	
Data points	
Question #	VAP-A2.4a
Question Text	Some workers are student workers, interns or apprentices OR a policy on learning programs is missing?
Rating	No
Conclusion	
Data points	
<b>WORKING HOURS</b>	
Question #	VAP-A3.1
Question Text	Hours worked in a workweek over the last 12 months does not exceed 60 hours
Rating	Major Non-Conformance



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Conclusion	<p>Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function. [Labor Law of the People’s Republic of China (2018 Amendment), Article 41 /中华人民共和国劳动法（2018修正）第四十一条 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, 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 laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours. /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。]</p>
Data points	<p>* Record review: 20 out of 20 working hour records covering each month of the period of October 2021 (random production month), November 2021 (random production month) and April 2022 (random production month) demonstrate hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function.</p> <p>* Record review: The facility does not have COVID19 recovery plan.</p> <p>* Record review: No working hours waiver is obtained.</p> <p>* Management interview: Management Department Manager confirms the facility does not have COVID19 recovery plan and confirms a) the maximum hours worked for October 2021 (random): 60 h/workweek b) the maximum hours worked for November 2021 (random): 62 h/workweek c) the maximum hours worked for April 2022 (random): 62 h/ workweek d) Other legal requirement (3 overtime hours/ day, 36 overtime hours/ month): d.a) the maximum overtime working hours worked for October 2021 (random) is 2 hours/ day and 104 hours/ month d.b) the maximum overtime working hours worked for November 2021 (random) is 4 hours/ day and 92 hours/ month d.c) the maximum overtime working hours worked for April 2022 (random) is 2 hours/ day and 70 hours/ month.</p> <p>* Worker interview: 20 out of 20 workers confirm a) the maximum hours worked for October 2021 (random): 60 h/ workweek b) the maximum hours worked for November 2021 (random): 62 h/workweek c) the maximum hours worked for April 2022 (random): 62 h/workweek d) Other legal requirement (3 overtime hours/ day, 36 overtime hours/ month): d.a) the maximum overtime working hours worked for October 2021 (random) is 2 hours/ day and 104 hours/ month d.b) the maximum overtime working hours worked for November 2021 (random) is 4 hours/ day and 92 hours/ month d.c) the maximum overtime working hours worked for April 2022 (random) is 2 hours/ day and 70 hours/ month.</p> <p>* Supporting evidence reference(s): RBA Working Hours Collection Template</p>
Question #	VAP-A3.2
Question Text	Workers receive at least one (1) day off every seven (7) days
Rating	Major Non-Conformance

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Conclusion	Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 38 /中华人民共和国劳动法 (2018修正) 第三十八条The employing unit shall guarantee that its staff and workers have at least one day off in a week. / 用人单位应当保证劳动者每周至少休息一日。]
Data points	<p>* Record review: 20 out of 20 working hour records covering each month of the period of October 2021 (random production month), November 2021 (random production month) and April 2022 (random production month) demonstrate workers do not receive at least one day off every seven days. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function.</p> <p>* Record review: The facility does not have COVID19 recovery plan.</p> <p>* Management interview: Management Department Manager confirms the facility does not have COVID19 recovery plan and confirms a) the maximum consecutive days worked for October 2021 (random production month): 6 consecutive days worked b) the maximum consecutive days worked for November 2021 (random production month): 6 consecutive days worked c) the maximum consecutive days worked for April 2022 (random production month): 12 consecutive days worked.</p> <p>* Worker interview: 20 out of 20 workers confirm a) the maximum consecutive days worked for October 2021 (random production month): 6 consecutive days worked b) the maximum consecutive days worked for November 2021 (random production month): 6 consecutive days worked c) the maximum consecutive days worked for April 2022 (random production month): 12 consecutive days worked.</p> <p>* Supporting evidence reference(s): RBA Working Hours Collection Template</p>
Question #	VAP-A3.3
Question Text	Adequate and effective policy and system/procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours
Rating	<b>Major Non-Conformance</b>
Conclusion	The Policy and procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours. However, the working hours controls are found to be in non-conformance of workers' overtime hours and weekly working hours, one day off per 7 are not in line with legal and RBA requirements. The highest weekly working hours are 62 hours/ workweek, the highest overtime hours are 4 hours/ day and 104 hours/ month, the longest consecutive working days are 12 days worked.



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Data points	<p>* Site observation: Time recording devices are present and in good working condition.</p> <p>* Record review: Employee Manual (Doc. No.: A-03-041-M0C0000, Rev.: 19, Issue date: September 25,2021) states the working hours, overtime and days off.</p> <p>* Record review: Working Hours Control Procedure (Doc. No.: A-03-000-M0C0000, Rev.: 12, Issue date: September 25, 2021) states the accurate implementation mechanisms to a) accurately determine b) record c) manage d) control working hours including overtime and days off.</p> <p>* Record review: 20 out of 20 working hour records covering each month of the period of October 2021 (random month), November 2021 (random month) and April 2021 (random month) demonstrate time is recorded accurately and completely, confirm workweek hours exceeding 60 hours with highest 62 hours and overtime hours exceeding local law with highest of 4 hours/ day and 104 hours/ month and workers do not receive at least one day off every seven days with longest 12 consecutive working days.</p> <p>* Record review: 2 out of 2 corrective action plans covering the period May 2021 to April 2022 demonstrate the investigations following non-conformance detection, the analysis, the results and the actions based on the analysis results, current status of the actions and any additional actions which are taken if the corrective actions are off track.</p> <p>* Record review: The facility does not have COVID19 recovery plan.</p> <p>* Record review: 12 out of 12 preventative maintenance records covering the period May 2021 to April 2022 demonstrate time recording devices are well maintained and in good working order.</p> <p>* Record review: 10 out of 10 leave records covering the period October 2021 (random production month), November 2021 (random production month) and April 2022 (random production month) confirm data found in A3.1 for workweek hours exceeding 60 hours and overtime hours exceeding local law and A3.2 for workers do not receive at least one day off every seven days.</p> <p>* Record review: 12 out of 12 production records covering the period October 2021 (random production month), November 2021 (random production month) and April 2022 (random production month) confirm data found in A3.1 for workweek hours exceeding 60 hours and overtime hours exceeding local law and A3.2 for workers do not receive at least one day off every seven days.</p> <p>* Management interview: Management Department Manager confirms the working hours controls are found to be in non-conformance of workweek hours exceeding 60 hours with highest 62 hours, overtime hours exceeding local law with highest of 4 hours/ day and 104 hours/ month and workers do not receive at least one day off every seven days with longest 12 consecutive working days and: a) details the tracking, implementation, monitoring and corrective actions b) explains how working hours are communicated and recorded c) Ensures the accuracy and maintenance of time recording devices.</p> <p>* Worker interview: 20 out of 20 workers confirm the working hours controls are found to be in non-conformance of workweek hours exceeding 60 hours with highest 62 hours, overtime hours exceeding local law with highest of 4 hours/ day and 104 hours/ month and workers do not receive at least one day off every seven days with longest 12 consecutive working days and a) explain the detail of the working hours policy b) confirm how their working hours are recorded c) state how they can verify the accuracy of time records and how they are adjusted if not accurate d) detail what communication they have received on working hours and overtime, which aligns with the policy and legal requirements.</p> <p>* Supporting evidence reference(s): RBA Working Hours Collection Template</p>
Question #	VAP-A3.4
Question Text	Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave
Rating	<b>Major Non-Conformance</b>
Conclusion	Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. [Regulations on Paid Annual Leave for Employees (2007), Article 3 / 职工带薪年休假条例 (2007) 第三条 Where an employee has served one full year but less than 10 years accumulatively, he is entitled to five days of annual leave. If he has served 10 full years but less than 20 years, annual leave is 10 days. If he has served for 20 full years, annual leave is 15 days. / 职工累计工作满1年不满10年的, 年休假5天; 已满10年不满20年的, 年休假10天; 已满20年的, 年休假15天。]

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Data points	<ul style="list-style-type: none"> <li>* Site observation: Workers take mandatory breaks which include at least one meal break per shift.</li> <li>* Record review: Employee Manual (Doc. No.: A-03-041-M0C0000, Rev.: 19, Issue date: September 25,2021) states sick leave, holidays, vacation, paternity and maternity leave and mandated meal and rest breaks. It states the detail of procedures to manage for sick leave, holidays, vacation, paternity and maternity leave and mandated meal and rest breaks. Employee Manual missed the content of provide paid annual leave to workers according to workers' society service length but on based on workers' service length in the facility.</li> <li>* Record review: 10 out of 10 leave records covering the period May 2021 to April 2022 demonstrate: a) leave records are stored for 12 months b) leave records are consistent with the medical certificates c) actual leaves and holidays are recorded and securely kept, paid annual leave are provided to workers according to workers' service length in the facility instead of workers' society service length.</li> <li>* Record Review: 2 out of 2 medical certificates covering the period May 2021 to April 2022 demonstrate consistency with the leave records for this period.</li> <li>* Management interview: Management Department Manager confirms paid annual leave are provided to workers according to workers' service length in the facility instead of workers' society service length and a) details the policies and procedures for sick leave, holidays, vacation and paternity and maternity leave b) confirms the break provisions for workers.</li> <li>* Worker interview: 20 out of 20 workers confirm paid annual leave are provided to them according to workers' service length in the facility instead of workers' society service length and a) explain their holiday and break as communicated b) detail their last shift break and holiday c) state the details of the medical leave policy d) confirm implementation conforms to the policy.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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### WAGES AND BENEFITS

Question #	VAP-A4.1
Question Text	Wages for regular and overtime hours are correctly calculated and paid to all workers
Rating	Conformance
Conclusion	Wages for regular and overtime hours are correctly calculated and paid to all workers.

Data points	<ul style="list-style-type: none"> <li>* Record review: Salary Structure and Welfare Management Procedure (Doc. No.: A-03-006-M0C0052, Rev.: 36, Issue date: September 25, 2021) states: a) the details of wages and compensation b) "Pay equals time worked" principle for any company-required activities c) all workers are paid no less than the agreed wage for all regular hours and overtime d) other compensation and benefits are paid and are on top of agreed wage for regular hours e) Payment made to leavers (resigned workers). And it states the implementation details on: a) wages and compensation b) "Pay equals time worked" principle for any company-required activities c) all workers are paid no less than the agreed wage for all regular hours and overtime d) other compensation and benefits e) Payment made to leavers (resigned workers).</li> <li>* Record review: 20 out of 20 payroll records covering each month of the period May 2021 to March 2022 (the last month's wages of have not been paid which was in line with the local legal law) demonstrate wages benefits, and overtime are correctly calculated as per working time and days off records.</li> <li>* Record review: 20 out of 20 working hour records covering each month of the period May 2021 to March 2022 demonstrate wages benefits, and overtime are correctly calculated.</li> <li>* Record review: 10 out of 10 leave records covering the period May 2021 to April 2022 demonstrate wages benefits, and overtime are correctly calculated.</li> <li>* Management interview: Management Department Manager a) explains how wages are calculated for all categories of employees b) states what process is in place to correct wages if errors are reported c) confirms when would the final payment and it is in compliance with the local law d) details the process to ensure on time payment e) explains the emergency actions taken if there are delays beyond their control.</li> <li>* Worker interview: 20 out of 20 workers confirm when they are paid, and their pay is correct.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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Question #	VAP-A4.2
Question Text	For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed.
Rating	Major Non-Conformance

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Conclusion	For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). [Regulation on the Payment of Wages in Guangdong Province (2016 Amendment), Article 13 /广东省工资支付条例 (2016修正) 第十三条 If the labor relationship between the employer and the laborer is discharged or terminated in accordance with the law, wages shall be paid to laborers in full at once on the date when the labor relation is terminated or discharged. / 用人单位与劳动者依法终止或者解除劳动关系的, 应当在终止或者解除劳动关系当日结清并一次性支付劳动者工资。]
Data points	<ul style="list-style-type: none"> <li>* Record review: 20 out of 20 payroll slips covering each month of the period of May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) demonstrate wages, benefits, and overtime are correctly calculated as per working time and days off records.</li> <li>* Record review: 11 out of 11 payroll payment records covering each month of the period of May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) demonstrate a) consistency with the pay roll slips and wages are paid timely b) accurate pay records are maintained for 11 months c) wages are paid directly to workers with no unauthorized deductions in a timely manner d) recurring pay (including overtime) is not delayed more than two days after the agreed timing for payment d) no financial penalty for maternity or sick leave.</li> <li>* Record review: 6 out of 6 severance payment records covering the period May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) demonstrate payment is not made in compliance with local law (within the day of labor terminated). Wages of resigned workers were not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month).</li> <li>* Management interview: Management Department Manager confirms wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month) and a) explains when and how wages are communicated to workers b) details what process is in place to correct wages if errors are reported.</li> <li>* Worker interview: 20 out of 20 workers a) confirm the payment amounts what is stated on their pay slip or equivalent b) explain how their wages are calculated c) detail what is the process if errors have occurred d) confirm no wage errors occurred e) state what deductions are made from their wages f) explain which employer contributions are required for them g) confirm they are paid timely, wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month).</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A4.3
Question Text	Wages are not deducted or reduced for disciplinary reasons
Rating	Conformance
Conclusion	Wages are not deducted or reduced for disciplinary reasons.
Data points	<ul style="list-style-type: none"> <li>* Record review: Workers Rewards and Punishments Control Procedure (Doc. No.: A-03-021-MOC0052, Rev.: 12, Issue date: April 25, 2021) a) prohibits disciplinary wage deductions b) includes "Pay equals time worked".</li> <li>* Record review: 2 out of 2 disciplinary records covering the period May 2021 to April 2022 show no form of disciplinary wage deduction.</li> <li>* Record review: 20 out of 20 payroll slips covering each month of the period May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) demonstrate no wage deduction for disciplinary reasons.</li> <li>* Management interview: Management Department Manager a) states what disciplinary measures are applied b) confirms disciplinary measures do not include wage deductions.</li> <li>* Worker interview: 20 out of 20 workers a) state what disciplinary measures are applied b) confirm disciplinary measures do not include wage deductions.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A4.4a
Question Text	Are there withholdings for taxes or required contributions to worker insurance schemes?
Rating	Yes

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Conclusion	
Data points	
Question #	VAP-A4.4b
Question Text	Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame
Rating	<b>Major Non-Conformance</b>
Conclusion	Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. [Regulation on the Administration of Housing Provident Fund (revised in 2002)/住房公积金管理条例 (2002修订) Housing Provident Fund regulations apply to the workers in all geographic regions of the country, whether they are migrant workers registered elsewhere or residential workers registered in the city where they are working. Article 15 Units shall register employee's information in housing provident fund management center since employee joins the units, set housing provident fund account for employee in the entrusted bank with the approved documents from housing provident fund center. Article 16 Contributions both for employee and unit must be calculated based on each worker's average monthly wage over the last year. Article 18 Different regions may establish variable housing provident fund rates, as decided by local governments, but contributions may not fall below a minimum of five percent (5%) of the monthly wage. / 第十五条单位录用职工的,应当自录用之日起30日内到住房公积金管理中心办理缴存登记,并持住房公积金管理中心的审核文件,到受委托银行办理职工住房公积金账户的设立或者转移手续。第十六条职工住房公积金的月缴存额为职工本人上一年度月平均工资乘以职工住房公积金缴存比例。单位为职工缴存的住房公积金的月缴存额为职工本人上一年度月平均工资乘以单位住房公积金缴存比例。第十八条职工和单位住房公积金的缴存比例均不得低于职工上一年度月平均工资的5%;有条件的城市,可以适当提高缴存比例。具体缴存比例由住房公积金管理委员会拟订,经本级人民政府审核后,报省、自治区、直辖市人民政府批准]
Data points	<p>* Record review: 11 out of 11 contribution payroll calculation records covering the period May 2021 to March 2022 (the last month's wages have not been paid which was in line with the local legal law) demonstrate a) monthly records of employer contributions to worker insurance schemes a.a) unemployment insurance a.b) retirement/pension insurance a.c) health/medical insurance a.d) life insurance a.e) accident/disability insurance b) analysis by individual worker c) total per contribution type.</p> <p>* Record review: 11 out of 11 contribution payment records covering the period May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) demonstrate for at least 11 months payments are made timely. The records reveal the facility does not provide housing provident fund for 68.57% (240 out of 350) workers.</p> <p>* Record review: 20 out of 20 payroll slips covering each month of the period May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) show employer and worker contributions. The records reveal the facility does not provide housing provident fund for 68.57% (240 out of 350) workers.</p> <p>* Management interview: Management Department Manager confirms the facility does not provide housing provident fund for 68.57% (240 out of 350) workers and a) confirms which deduction is applied to worker wages b) explains how these are calculated c) details what system is in place to implement, monitor, communicate to workers d) states the process to ensure on time payment e) details the emergency actions taken if there are delays beyond their control.</p> <p>* Supporting evidence reference(s): A4.4</p>
<b>HUMANE TREATMENT</b>	
Question #	VAP-A5.1
Question Text	No evidence of harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers
Rating	<b>Conformance</b>
Conclusion	No evidence of harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming or verbal abuse of workers.

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Data points	<ul style="list-style-type: none"> <li>* Site observation: No identification of possible instances of inhumane treatment.</li> <li>* Record review: 5 out of 5 grievance records covering the period May 2021 to April 2022 do not show instances of inhumane treatment.</li> <li>* Record review: No correction action required for inhumane treatment issue as no such finding reported and identified.</li> <li>* Record review: 2 out of 2 disciplinary records covering the period May 2021 to April 2022 show no inhumane disciplinary measures.</li> <li>* Management interview: Management Department Manager a) confirms no grievance or complaints have taken place regarding inhumane treatment b) details what actions have been taken if any instances were reported.</li> <li>* Worker interview: 20 out of 20 workers a) detail no grievance or complaints have taken place regarding inhumane treatment to their knowledge b) describe management's response to the incident, documentation and disciplinary procedures.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A5.2
Question Text	Adequate and effective policies and procedures on decent/humane working conditions and fair treatment of workers are established
Rating	Conformance
Conclusion	Adequate and effective policies and procedures on decent/humane working conditions and fair treatment of workers are established.
Data points	<ul style="list-style-type: none"> <li>* Record review: Employee Manual (Doc. No.: A-03-041-M0C0000, Rev.: 19, Issue date: September 25,2021) states the details humane treatment at the facility.</li> <li>* Record review: Workers Rewards and Punishments Control Procedure (Doc. No.: A-03-021-M0C0052, Rev.: 12, Issue date: April 25, 2021) states the details humane treatment at the facility.</li> <li>* Management interview: Management Department Manager states the details of the humane treatment policies and procedures.</li> <li>* Worker interview: 20 out of 20 workers state the details of the humane treatment policies and procedures.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A5.3
Question Text	Disciplinary actions are recorded, consistent with the procedures and reviewed by management
Rating	Conformance
Conclusion	Disciplinary actions are recorded, consistent with the procedures and reviewed by management.
Data points	<ul style="list-style-type: none"> <li>* Record review: 2 out of 2 disciplinary records covering the period May 2021 to April 2022 show a) records are available for the last 12 months b) disciplinary actions include signature or confirmation of worker c) review by management.</li> <li>* Record review: Workers Rewards and Punishments Control Procedure (Doc. No.: A-03-021-M0C0052, Rev.: 12, Issue date: April 25, 2021) states the detailed process of how disciplinary actions are appealed.</li> <li>* Management interview: Management Department Manager a) states how disciplinary actions are recorded b) explains how disciplinary actions are communicated to workers c) details how appeals are handled.</li> <li>* Worker interview: 20 out of 20 workers a) explain how disciplinary actions are recorded b) confirm the disciplinary action records are accurate and they have access to their own records c) state how disciplinary actions are taken, recorded, appealed and communicated to them.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>NON-DISCRIMINATION</b>	
Question #	VAP-A6.1
Question Text	No evidence of discrimination
Rating	Conformance
Conclusion	There is no evidence of discrimination.

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Data points	<ul style="list-style-type: none"> <li>* Site observation: No visible instances of discrimination.</li> <li>* Record review: 8 out of 8 application questionnaires covering the period May 2021 to April 2022 evaluate the candidate's fitness for the job only.</li> <li>* Record review: 2 out of 2 job postings covering the period May 2021 to April 2022 confirm no discrimination.</li> <li>* Record review: 8 out of 8 hiring and termination records covering the period May 2021 to April 2022 confirm the candidate's ability to perform the job's requirements only.</li> <li>* Record review: 2 out of 2 job descriptions covering the period May 2021 to April 2022 focus solely on occupational qualifications, no personal characteristics are in place.</li> <li>* Record review: 20 out of 20 personnel files confirm workers or potential workers are not subjected to medical tests that could be used in a discriminatory way, pregnancy testing or contraception is not used as a condition of employment and all conditions regarding pregnancy and postnatal employment protections including Maternity and Paternity benefits are respected.</li> <li>* Record review: 20 out of 20 payroll records covering each month of the period of May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) confirm no instances of discrimination.</li> <li>* Record review: 6 out of 6 promotion records covering the period of May 2021 to April 2022 confirm no instances of discrimination.</li> <li>* Record review: 2 out of 2 disciplinary records covering the period May 2021 to April 2022 confirm no instances of discrimination.</li> <li>* Management interview: Management Department Manager states they do not have discrimination case.</li> <li>* Worker interview: 20 out of 20 workers confirm that the workplace is free of discrimination.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A6.2
Question Text	Adequate and effective policies and procedures that ban discrimination and harassment are in place
Rating	Conformance
Conclusion	Adequate and effective policies and procedures that ban discrimination and harassment are in place.
Data points	<ul style="list-style-type: none"> <li>* Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) states a) a ban on all forms of discrimination b) decisions in hiring, employing (compensation, promotion, access to training), or terminating workers are based solely on the candidate's ability to perform the job's requirements.</li> <li>* Record review: Anti-discrimination Control Procedure (Doc. No.: A-03-058-M0C0000, Rev.: 1, Issue date: October 11, 2021) states a) periodical review to determine that there is no prohibited discrimination of a.a) hiring practices a.b) compensation records a.c) employee evaluation and promotion documents a.d) training records a.e) employee benefits policies and procedures a.f) disciplinary records.</li> <li>* Record review: 12 out of 12 discrimination practice review records covering the period May 2021 to April 2022 show a periodic review as per Anti-discrimination Control Procedure.</li> <li>* Record review: No corrective action plan is needed for no discrimination case.</li> <li>* Management interview: Management Department Manager confirms how the facility a) recruits b) hires c) promotes d) terminates workers consistent with the non-discrimination policy.</li> <li>* Worker interview: 20 out of 20 workers detail the content of the RBA Management Manual.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A6.3
Question Text	Reasonable accommodation for religious practices is provided
Rating	Conformance
Conclusion	Reasonable accommodation for religious practices is provided.

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Data points	<ul style="list-style-type: none"> <li>* Site observation: Clean and safe religious areas are provided.</li> <li>* Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) states a) the commitment to provide reasonably accommodate for religious practices b) adjustments to the work environment to allow a worker to comply with their religious beliefs while b.a) at work b.b) in the job application process. And it states a mechanism for receiving religious accommodation requests.</li> <li>* Record review: No religious accommodation request received from workers.</li> <li>* Record review: No CBA in the facility.</li> <li>* Management interview: Management Department Manager a) states how to request Reasonable Religious Accommodation b) confirms no request they have received c) Although no request from employees, the facility provides religious areas in production building for employees.</li> <li>* Worker interview: 20 out of 20 workers a) state how to request Reasonable Religious Accommodation b) confirm they all have no request about religious accommodation.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>FREEDOM OF ASSOCIATION</b>	
Question #	VAP-A7.1
Question Text	Workers can form or enroll in a trade union of their own free will
Rating	Conformance
Conclusion	Workers can form or enroll in a trade union of their own free will.
Data points	<ul style="list-style-type: none"> <li>* Site observation: a) no evident presence of violence and explicit threats of any kind b) no evidence present of management's control of a trade union.</li> <li>* Record review: Employee representative organization management procedure (Doc. No.: A-03-049-M0C0000, Rev.: 3, Issue date: September 22,2020) states the commitment to: a) respect that the right of workers to form or enroll in a trade union, or to refrain from doing so b) a philosophy of "no interference" with a trade union c) will not finance a trade union.</li> <li>* Record review: 5 out of 5 trade union meeting minutes covering the period May 2021 to April 2022 demonstrate a) 12 months sources of funding and materials b) management contributions are limited to providing meeting space and meeting materials.</li> <li>* Management interview: Management Department Manager a) states the detail of the Policy of Freedom of Association b) confirms a trade union is present c) details what information is communicated to workers d) states how workers acknowledge understanding of the information provided e) confirms what they contribute to trade union meetings f) states how they ensure avoidance of influence or control.</li> <li>* Worker interview: 20 out of 20 workers (including 1 trade union representative) a) state the detail of the Policy of Freedom of Association b) confirm a trade union is present c) state management does not actively prevent them from joining a trade union, or refraining from doing so d) confirm management does not actively interfere with their choice of trade union e) state they are member of trade union and they enrolled voluntarily f) confirm there is no differentiation of treatment between trade union and non-members g) detail the source of support h) state the amount contributed by the facility.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A7.2a
Question Text	Is there a Collective Bargaining Agreement in place?
Rating	No
Conclusion	
Data points	
Question #	VAP-A7.3
Question Text	Participants respect the legal right of all workers to peacefully assemble as well as respect the right of workers to refrain from doing so
Rating	Conformance

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Conclusion	Participants respect the legal right of all workers to peacefully assemble as well as respect the right of workers to refrain from doing so.
Data points	<ul style="list-style-type: none"> <li>* Site observation: No signs of explicit prohibition of the right of peaceful assembly.</li> <li>* Record review: Employee representative organization management procedure (Doc. No.: A-03-049-M0C0000, Rev.: 3, Issue date: September 22,2020) states the commitment to the right of workers a) individually or collectively b) to express, promote, pursue, and defend their concerns or ideas c) or to refrain from doing so.</li> <li>* Record review: 5 out of 5 trade union meeting minutes covering the period May 2021 to April 2022 confirm a) a respect for the right of workers to individually or collectively b) to express, promote, pursue, and defend their concerns or ideas c) the right of workers to refrain from doing so d) no interference with, restrain, or coerce workers in the exercise of their right.</li> <li>* Management interview: Management Department Manager a) states the details of the policies/procedures on peaceful assembly b) confirms workers have not individually or collectively raised concerns or ideas in the past c) details how management acted in response to the workers individually or collectively raising concerns or ideas.</li> <li>* Worker interview: 20 out of 20 workers (including 1 trade union representative) a) state the details of the policies/procedures on peaceful assembly b) confirm workers have not individually or collectively raised concerns or ideas in the past c) detail how management acted in response to the workers individually or collectively raising concerns or ideas.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-A7.4a
Question Text	Is there a union or worker representative?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-A7.4b
Question Text	No evidence of unequal treatment between unionized or worker representatives and other workers exists
Rating	Conformance
Conclusion	No evidence of unequal treatment between unionized and other workers exist.
Data points	<ul style="list-style-type: none"> <li>* Site observation: No evident presence of a prohibition of association with a trade union.</li> <li>* Record review: 5 out of 5 trade union meeting minutes covering the period May 2021 to April 2022 reveal no evidence that the facility: a) dismisses b) disciplines c) explicitly threatens workers in order to c.a) encourage or discourage workers from c.a.a) forming c.a.b) joining c.a.c) being part of a trade union c.a.d) refraining from doing so.</li> <li>* Record review: 5 out of 5 grievance records covering each month of the period May 2021 to April 2022 reveal no evidence that the facility: a) no documented episodes of violence, explicit threats of any kind or any other violations of the right to freedom of association b) dismisses c) disciplines d) explicitly threatens workers in order to d.a) encourage or discourage workers from d.a.a) forming d.a.b) joining d.a.c) being part of a trade union d.a.d) refraining from doing so.</li> <li>* Record review: 20 out of 20 payroll records covering each month of the period May 2021 to March 2022 (the last month's wages of April 2022 have not been paid which was in line with the local legal law) confirm that trade union representatives are paid the same as other workers in similar job functions.</li> <li>* Management interview: Management Department Manager a) states no case of trade union discrimination has been reported; b) details how the parties resolved such case of trade union discrimination situation.</li> <li>* Worker interview: 20 out of 20 workers (including 1 trade union representative) a) confirm they understand the process by which they can report a case of discrimination which includes a notification of resolution b) state no case of trade union discrimination has been reported.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>LABOR PROVISION GOOD PRACTICES</b>	
Question #	VAP-A8.1a
Question Text	Are there Labor provision good practices?
Rating	No

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Conclusion	
Data points	
<b>B) Health &amp; Safety</b>	
<b>OCCUPATIONAL SAFETY</b>	
Question #	VAP-B1.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B1.1b
Question Text	All required permits, licenses and test reports for occupational safety are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Conformance
Conclusion	All required permits, licenses and test reports for health & safety is in place and a process is implemented to ensure permits and licenses are up to date at all times.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Licenses related to special equipment for 3 elevators, 16 pressure vessels and 1 forklift are placed at the working area.</li> <li>* Record review: Special equipment and operator certificate management procedure (Doc. No.: Nil, Rev. Nil, Issue date: Nil) states the documented process to ensure permits are renewed 1 month before current permits expire.</li> <li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li> <li>* Record review: Drinking water test report (report number: ZQJC检字(2021)第0713006, issued date: August 18, 2021, Expiry date: Nil) demonstrates conformance with legal requirements and no contaminant risk for workers.</li> <li>* Record review: 10 out of 10 pressure vessels annual test reports covering the period May 2021 to April 2022 demonstrate conformance with legal requirements.</li> <li>* Record review: 3 out of 3 elevators' annual test reports covering the period of May 2021 to April 2022 demonstrate conformance with legal requirements.</li> <li>* Record review: Electrician certificate (Doc. No.: T412829198403064019, Issue date: October 12, 2018, Expiry date: September 24, 2027) demonstrates conformance with legal requirements.</li> <li>* Record review: Special equipment safety management personnel certificate (Doc. No.: ZTPX2021-A01394, Issue date: July 2, 2021, Expiry date: July 2, 2024) demonstrates conformance with legal requirements.</li> <li>* Record review: Quick-open type pressure vessel operation permit (Doc. No.: 412722198612283517 Issue date: May 22, 2019, Expiry date: May 22, 2023) demonstrates conformance with legal requirements.</li> <li>* Record review: Forklift operation permit (Doc. No.: 412721198011152412, Issue date: July 8, 2021, Expiry date: June 30, 2025) demonstrates conformance with legal requirements.</li> <li>* Record review: Test report for thunder protection devices of production building (Doc. No.: YFS-4-2538, Issue date: Jan 7, 2022, Expiry date: Jan 7, 2023) demonstrates conformance with legal requirements.</li> <li>* Management interview: Quality Vice Manager a) states which occupational safety permits are required b) details what testing was done c) explains which process is in place to ensure permits are renewed before current permits expire d) confirms which department is in charge of the license/permit, frequency to renew or apply.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-B1.2
Question Text	Potential for worker exposure to health & safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) identified, assessed and mitigated using the Hierarchy of Controls.
Rating	Major Non-Conformance

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Conclusion	<p>Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>[Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 24/危险化学品安全管理条例 (2013修订) 第二十四条. Hazardous chemicals shall be stored at designated warehouses, sites or store rooms and managed by designated persons./ 危险化学品应当储存在专用仓库、专用场地或者专用储存室内，并由专人负责管理；]</p>
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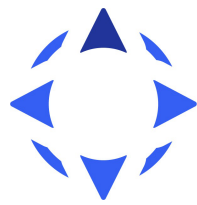
## Validated Audit Report

Data points	<p>* Site observation: a) Engineering controls are used where appropriate b) Buildings do not show significant cracks or unsupported structures, walls, passages, mezzanines c) Confined spaces are identified d) Chemicals are adequately and effectively d.a) categorized d.b) handled d.c) moved within the facility d.d) controlled d.e) access to hazardous substances is controlled d.f) Potential employee exposure methods are adequate and effective d.g.a) segregation d.g.b) secondary containment d.g.c) ventilation d.g.d) fire protection d.g.e) appropriate storage cabinets e) stairways and elevated work areas are provided with appropriate guardrails and handrails f) elevated work platforms are rated for load capacity g) aisles, stairways, and work areas are free of tripping hazards h) workers are provided with appropriate fall protection for work in elevated work areas i) buildings are facilitated with tie-off points j) precautions and controls of electrical hazards are in place k) energized parts are protected from accidental contact by enclosures and barriers l) in areas where powered industrial vehicles are used, pedestrian walkways are clearly delineated and physically separated from vehicle operation areas m) combustible storage is minimized and limited to areas with adequate fire detection and protection n) flammable and combustible materials are properly stored to prevent the accumulation of vapors o) ignition hazards are eliminated in areas where combustible and flammable materials are stored or used. P) Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C000, Rev. V6, Issue date: June 15, 2021) states to a) identify b) assess c) mitigate using the Hierarchy of Controls potential worker health &amp; safety hazards. And it states a) the details of safe work practices where engineering controls are not feasible or do not completely control the hazard b) a daily safety inspection or prior to each use for all industrial powered vehicles c) electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards.</p> <p>* Record review: Safety Work Management Procedure (Doc. No.: A-03-001-M0C000, Rev. V12, Issue date: October 8, 2021) states confined spaces hazards are evaluated before workers are allowed to enter and a hot work permit system for welding, cutting and brazing.</p> <p>* Record review: Lock-out/Tag-out Procedure (Doc. No.: A-04-106-Q0C0000, Rev. v1, Issue date: October 7, 2021) states lockout/ tag out program for work on equipment where stored energy (electrical, pneumatic, mechanical) or inadvertent start-up could injure workers.</p> <p>* Record review: 12 out of 12 risk assessments covering the period May 2021 to April 2022 show confined spaces hazards are evaluated before workers are allowed to enter.</p> <p>* Record review: 2 out of 2 confined space entry evaluations covering the period May 2021 to April 2022 show confined spaces hazards are evaluated before workers are allowed to enter.</p> <p>* Record review: 2 out of 2 hot work permits covering the period May 2021 to April 2022 show hot work permit system is in place for welding, cutting and brazing.</p> <p>* Record review: 12 out of 12 safety inspection records covering the period May 2021 to April 2022 show a safety inspection is performed daily or prior to each use for all industrial powered vehicles.</p> <p>* Record review: 12 out of 12 electrical installation inspections covering the period May 2021 to April 2022 show electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards.</p> <p>* Record review: 2 out of 2 lockout/ tagout records covering the period May 2021 to April 2022 show lockout/tag out program is in place for work on equipment where stored energy or inadvertent start-up could injure workers.</p> <p>* Record review: 2 out of 2 safety program review records covering the period May 2021 to April 2022 show a periodic program review was carried out.</p> <p>* Record review: 2 out of 2 corrective action plans covering the period May 2021 to April 2022 demonstrate the investigations following periodic safety program review, the analysis, the results and the actions based on the analysis results, current status of the actions and any additional actions which are taken if the corrective actions are off track.</p> <p>* Management interview: Quality Vice Manager confirms Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#. And states a) methods b) controls c) procedures they have in place to minimize worker exposure to occupational safety.</p> <p>* Worker interview: 2 out of 2 workers who work in finished good warehouse state that four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>* Worker interview: 20 out of 20 workers a) state which controls the facility has in place to minimize worker exposure to occupational safety b) detail the task-specific hazards of their position and how to work safely with those hazards.</p> <p>* Supporting evidence reference(s): B1.2.JPG</p>
Question #	VAP-B1.3a
Question Text	Is PPE required?
Rating	Yes

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## Validated Audit Report

Conclusion	
Data points	
Question #	VAP-B1.3b
Question Text	Appropriate Personal Protective Equipment (PPE) is consistently and correctly used where required to control health & safety hazards and worker exposure
Rating	<b>Major Non-Conformance</b>
Conclusion	<p>Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.</p> <p>[Production Safety Law of the People's Republic of China (2014 Amendment), Article 42/中华人民共和国安全生产法 (2014修正) 第四十二条.</p> <p>A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules./ 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。]</p>
Data points	<p>* Site observation: a) PPE selection is appropriate for the given hazard; b) PPE requirements are communicated to employees via posted signs; c) PPE is not worn by all affected people either performing those tasks or in the areas that require PPE; d) Workers are performing tasks that require PPE according to PPE procedure requirements; e) Most PPE is available; f) PPE is in good and working condition; g) PPE is appropriately stored and accessible; h) medical masks for the workers work in dispensing positions in A&amp;B workshop on the 3rd Floor of production building A#. i) Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.</p> <p>* Record review: Personal Protective Equipment Management Regulation (Doc. No: A-03-047-M0C000, Rev. 8, Issue date: April 26, 2022) states a) the process to assess a.a) worker safety hazards a.b) determine appropriate PPE for specific job tasks and areas of the facility. b) the PPE requisition and renewal procedures c) the notification and enforcement process for PPE use.</p> <p>* Record review: 20 out of 20 payroll records covering each month of the period April 2021 to March 2022 demonstrate no deductions made for PPE.</p> <p>* Record review: PPE evaluation record (Doc. No.: FM-WAR-023A, Rev. Nil, Issue date: January 4, 2022) shows PPE adequacy evaluation records and aligns with Personal Protective Equipment Management Regulation.</p> <p>* Record review: 12 out of 12 PPE replacement records covering the period May 2021 to April 2022 show Personal Protective Equipment Management Procedure is adequately implemented.</p> <p>* Record review: 12 out of 12 new PPE inventory logs covering the period May 2021 to April 2022 show new PPE is available and requested when needed.</p> <p>* Record review: Job specific PPE matrix (Doc. No.: Nil, Rev. Nil, Issue date: December 31, 2021) is available and consistent with the job hazard and PPE evaluation results.</p> <p>* Record review: 2 out of 2 PPE fit test records covering the period May 2021 to April 2022 demonstrate fit tests for respiratory protection equipment are performed as per Personal Protective Equipment Management Regulation.</p> <p>* Management interview: Quality Vice Manager confirms a) medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#. b) Four workers in grading workshop not wear earplugs during operation on the 2nd floor of production building A#. and states c) states what PPE is required for which areas d) details what procedures are place d.a) to ensure PPE is appropriate to work hazards d.b) appropriately utilized by all affected personnel.</p> <p>* Worker interview: 20 out of 20 workers a) state what PPE is required in the areas they work in; b) explain how their PPE is obtained and ensured it is safe and valid.</p> <p>* Worker interview: 2 out of 2 workers who work in A&amp;B workshop state that medical masks available for them. 2 out of 2 workers in grading workshop state that they do not wear earplugs.</p> <p>* Supporting evidence reference(s): B1.3-1.jpg, B1.3-2.jpg.</p>
Question #	VAP-B1.4a
Question Text	Are there any female workers?

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Rating	Yes
Conclusion	
Data points	
Question #	VAP-B1.4b
Question Text	Reasonable steps are in place to remove pregnant women/nursing mothers from working condition with high hazards, minimize any workplace health and safety risks to pregnant women and nursing and provide reasonable accommodations for nursing mothers
Rating	Conformance
Conclusion	Reasonable steps are in place to remove pregnant women and nursing mothers from working condition with high hazards, minimize any workplace health and safety risks to pregnant women and nursing mothers and provide reasonable accommodations for nursing mothers.
Data points	<p>* Site observation: a) No pregnant workers available b) Reasonable accommodation for nursing mothers is in place.</p> <p>* Record review: Marriage and Maternity Leave Management Regulation (Doc. No.: A-03-060-M0C0000, Rev. V1, Issue date: October 11, 2021) states a) the risk management process to: a.a) assess the potential hazards to expecting mothers before a pregnancy is reported, a.b) a worker-specific risk assessment of the worker's job to assess risk to mother and fetus after a pregnancy is reported a.c) a worker-specific post-natal risk assessment of the worker's job to assess risk to mother and possible impacts on the baby through breastfeeding after the mother returns to work b) All reasonable efforts must be made to minimize the risk identified in each of the 3 risk assessments. c) the procedure to c.a) provide reasonable break time for a worker to express breast milk for her nursing child for one year after the child's birth c.b) each time such worker has a need to express the milk c.c) provide a place c.c.1) other than a bathroom, c.c.2) shielded from view c.c.3) free from intrusion from coworkers and the public d) the commitment to minimize the Health &amp; Safety impact on pregnant women and nursing mothers.</p> <p>* Record review: 6 out of 6 personnel files reveal specific to worker pre-and post-natal risk assessment and actions taken in line with Marriage and Maternity Leave Management Regulation.</p> <p>* Record review: 2 out of 2 risk assessments covering the period May 2021 to April 2022 demonstrate risks for pregnant workers and actions taken.</p> <p>* Management interview: Quality Vice Manager a) states the detail of the general policy on minimizing the Health &amp; Safety impact in pregnant woman and nursing mothers b) provides an overview of the risk assessment process for pregnant woman and nursing mothers c) details what actions have been taken recently for pregnant workers who notified their pregnancy d) explains what reasonable accommodations are provided for nursing mothers.</p> <p>* Worker interview: 20 out of 20 workers (no pregnant woman and nursing mother is in the factory) a) state there are no pregnant worker in the factory b) explain what actions management took for pregnant workers and nursing mothers c) confirm the reasonable accommodations provided for nursing mothers.</p> <p>* Supporting evidence reference(s): N/A</p>
<b>EMERGENCY PREPAREDNESS</b>	
Question #	VAP-B2.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B2.1b
Question Text	All required permits, licenses and inspection/testing reports for fire safety response equipment (including fire suppression equipment) and emergency preparedness are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Conformance
Conclusion	All required licenses for fire safety response equipment (including fire suppression equipment) and emergency preparedness are in place and a process is implemented to ensure permits and licenses are up to date at all times.

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Data points	<ul style="list-style-type: none"><li>* Site observation: Posting of emergency numbers and procedures are appropriately displayed.</li><li>* Record review: Fire safety management procedure (Doc. No.: A-04-003-M0C0053, Rev. V14, Issue date: October 8, 2021) states the documented process to ensure permits are renewed before current permits expire.</li><li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: Jan 4, 2022) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li><li>* Record review: Fire-fighting acceptance certificate (Doc. No.: 东公消验字[2000]第III-1030号, Issue date: October 27, 2000, Expiry date: Nil) demonstrates production buildings conformance with legal requirements.</li><li>* Management interview: Quality Vice Manager a) states which fire licenses are required b) details what license was done c) explains which process is in place to ensure licenses are renewed before current permits expire d) confirms which department is in charge of the license, frequency to renew or apply.</li><li>* Supporting evidence reference(s): N/A</li></ul>
Question #	VAP-B2.2
Question Text	Adequate and effective fire detection, alarm and suppression systems are in place
Rating	Conformance
Conclusion	Adequate and effective fire detection, alarm and suppression systems are in place.
Data points	<ul style="list-style-type: none"><li>* Site observation: a) Automatic heat and smoke detection as required by law are in place b) Detector devices and system are in function c) All buildings have a manual or automatic fire alarm and notification system d) fire alarm control system is free of trouble e) fire alarm manual call-points or pull-stations are provided at egress routes to exits f) Portable fire extinguishers are installed g) fire extinguisher inspection tags are present and up to date h) automatic fire sprinklers as required by law insurance company is installed appropriately i) fire hose inspection tags are present and up to date j) fire water tank and water pressure are normal.</li><li>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C0000, Rev. V6, Issue date: June 15, 2021) describes the process and schedule for a) automatic fire sprinklers b) portable fire extinguishers c) heat and smoke detection d) alarm and notification system to be on a regular basis, as required by common practice: e) inspected f) tested g) maintained.</li><li>* Record review: 12 out of 12 portable fire fighting equipment inspection records covering the period May 2021 to April 2022 demonstrate the inspection frequency is monthly.</li><li>* Record review: 12 out of 12 automatic heat and smoke detectors inspection records covering the period May 2021 to April 2022 demonstrate the inspection frequency is monthly.</li><li>* Record review: 12 out of 12 alarm inspection records covering the period May 2021 to April 2022 demonstrate the inspection frequency is monthly.</li><li>* Record review: 12 out of 12 fire safety equipment maintenance records covering the period May 2021 to April 2022 demonstrate preventative maintenance is carried out on all relevant fire safety equipment.</li><li>* Record review: 12 out of 12 other fire safety equipment (server room systems) inspection records covering the period of May 2021 to April 2022 demonstrate the inspection frequency is once per month.</li><li>* Management interview: Quality Vice Manager a) states which firefighting systems are in place b) explains which alarm and notification system is in place c) confirms how often these systems are c.a) inspected c.b) tested c.c) maintained.</li><li>* Worker interview: 20 out of 20 workers state where are the nearest a) fire extinguishers b) hose station c) fire alarm call-points.</li><li>* Supporting evidence reference(s): N/A</li></ul>
Question #	VAP-B2.3
Question Text	All potential emergencies that could affect the site are identified and assessed, and adequate and effective emergency preparedness and response programs (plans/procedures) are established
Rating	Conformance
Conclusion	All potential emergencies that could affect the site are identified and assessed, and adequate and effective emergency preparedness and response programs are established.

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Data points	<p>* Site observation: a) adequate and effective signage is observed with a.a) emergency number(s) a.b) emergency team a.c) emergency plot, evacuation, and response plan b) maps are posted throughout the facility which clearly identify b.a) exit routes b.b) muster points b.c) in the correct orientation c) Muster points are established c.a) in safe locations c.b) enable employee accountability during an emergency. d) Emergency response kits are d.a) easily located d.b) accessible near muster points.</p> <p>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C0000, Rev. V6, Issue date: June 15, 2021) states a) an adequate risk assessment process considering harm to a.a) life a.b) the environment a.c) property b) the requirement to update the risk assessment when b.a) there is a Significant Change b.b) at least every 3 years.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states the current emergency response plans (ERP) a) business continuity plan b) business resumption plan c) reflecting the risk assessment d) contact information for emergency responders e) the details including frequency of the adequate emergency evacuation drill program for e.a) fire e.b) other emergencies f) drill includes all areas g) drill includes all workers h) at least one drill when it is dark.</p> <p>* Record review: Hazard Source Identified and Risk assessment Record (Doc. No.: Nil, Rev. Nil, Issue date: January 4, 2022) states a) the detail of the risk assessment, b) risk factors considered c) risk analysis and methodology d) risk assessment result.</p> <p>* Record review: 9 out of 9 post-emergency plans covering the period May 2021 to April 2022 demonstrate a) incident reporting (including effectiveness evaluation of each drill) b) root cause investigation c) corrective and preventative actions and any additional actions which are taken if the corrective actions are off track.</p> <p>* Management interview: Quality Vice Manager a) states how often they assess risk b) explains which emergency situations have been identified c) details how the emergency plans function d) confirms there was no loss of facility or severe damage e) states how they implement business continuity and resumption plans.</p> <p>* Worker interview: 20 out of 20 workers a) state they know what to do in the event of a possible emergency b) confirm where to gather (muster points) c) explain how management ensures all people are accounted for during an emergency.</p> <p>* Supporting evidence reference(s): NA</p>
Question #	VAP-B2.4
Question Text	Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained
Rating	Priority Non-Conformance
Conclusion	<p>Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&amp;B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters. No containment action from factory.</p> <p>[Fire Prevention Law of the People's Republic of China (2019 Amendment), Article 16/中华人民共和国消防法 (2019修正) 第十六条 Organs, social groups, enterprises, public institutions and other entities shall perform the following fire safety duties: 4. to ensure that the evacuation passages, safety exits and fire truck passages are clear and the fire and smoke compartmentation and fire separation distance meet the relevant fire protection technical standards; 机关、团体、企业、事业等单位应当履行下列消防安全职责：（四）保障疏散通道、安全出口、消防车通道畅通，保证防火防烟分区、防火间距符合消防技术标准；]</p>

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Data points	<p>* Site observation: a) an adequate number of effective exit routes from most area are present b) Exit routes are separated by an appropriate distance and do not share a common exit c) Exit routes are clear of obstructions d) Exit discharges discharge to open space lot, and do not discharge to an enclosed area e) Exits are free of material storage f) enclosures are not used for any other purpose except for egress g) All exit route doors which serve high occupancy (&gt;50) or hazardous areas open outward h) Most exit route doors open without using a key, badge, code, special knowledge, or effort i) All exit discharge doors have listed panic hardware installed or can be pushed open in a single motion. j) Exit signs are provided to mark exits on every floor k) Exit signs are illuminated and lighted in the event of a power failure l) Additional exit and directional signs are provided at main passageways, long corridors and at other locations where the way to the nearest exit is not clear. m) Emergency lighting are provided and installed to illuminate means of egress in the event of a power failure n) Lighting provided is adequate and functional emergency lighting in stairs, aisles, corridors, ramps, and passageways leading to exits, and in other areas as required by applicable laws o) Either battery or backup generator power emergency lighting p) Penetrations are limited to sprinkler pipes, standpipes, and electrical services, pipe and duct installation serving the enclosures q) Openings into the enclosures are protected by fire rated doors or window r) Fire doors are in good condition, self-closing or automatic closing s) Integrity of exit enclosures is maintained. t) The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse u) One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters v) One exit available in the A&amp;B workshop on the 3rd floor of production building A# w) 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states the process in place to ensure effective emergency Exit Access, exits and Exit Discharge with unobstructed egress is in place.</p> <p>* Record review: 12 out of 12 emergency support inspection records covering the period May 2021 to April 2022 demonstrate a) emergency support facilities (emergency lighting, emergency exit signs, evacuation paths, exit enclosures) are maintained b) are inspected once per month.</p> <p>* Management interview: Quality Vice Manager a) details the emergency support facilities in place b) explains how these are inspected and recorded. c) The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse d) One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters e) One exit available in the A&amp;B workshop on the 3rd floor of production building A# f) 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked. No containment action from factory.</p> <p>* Worker interview: 20 out of 20 workers a) state they know where the exit b) The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse c) One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters d) One exit available in the A&amp;B workshop on the 3rd floor of production building A#.</p> <p>* Worker interview: 2 out of 2 workers in materials warehouse state that 1 out of 2 exits in material warehouse is locked. No containment action from factory.</p> <p>* Supporting evidence reference(s): B2.4-1.jpg, B2.4-2.jpg, B2.4-3.jpg, B2.4-4.jpg.</p>
Question #	VAP-B2.5
Question Text	Adequate and effective fire and other emergency evacuation and response drills are conducted with all employees, and records are maintained
Rating	Conformance
Conclusion	Adequate and effective fire and other emergency evacuation and response drills are conducted with all employees, and records are maintained.
Data points	<p>* Record review: 12 out of 12 ERP drill evaluation reports covering the period May 2019 to April 2022 demonstrate a) records are available for the last 3 years b) the detailed write up of the drills c) the analysis of each drill carried out d) resulting corrective or preventive actions and any additional actions which are taken if the corrective actions are off track.</p> <p>* Management interview: Quality Vice Manager a) states when the previous drill was held b) details all corrective actions from the drill have been completed or are on track.</p> <p>* Worker interview: 20 out of 20 workers a) explain what happens during an emergency drill (stop work, evacuate, muster points) b) confirm the last drill they participated in workplace and dormitory area (on November 10, 2021).</p> <p>* Supporting evidence reference(s): N/A</p>

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Question #	VAP-B2.6a
Question Text	Is there an emergency response team?
Rating	Yes
Conclusion	
Data points	

Question #	VAP-B2.6b
Question Text	Designated emergency response personnel are provided adequate and effective PPE and training on an annual basis
Rating	Conformance
Conclusion	Designated emergency response personnel are provided adequate and effective PPE and training on an annual basis.
Data points	<p>* Site observation: a) emergency response PPE is a.a) available a.b) adequate a.c) in good and working condition b) emergency response PPE storage is clearly b.a) marked b.b) visible b.c) easily accessible c) Badges, different colored attire/hard-hat, and office/cubicle signage which identify emergency response team personnel are used.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states a) the assigned emergency response team (ERT) is formed b) ERT is available during all working shifts c) ERT has the obligation and authority to direct the facility's response to emergencies to ensure the protection of c.a) worker health and safety c.b) the environment c.c) property.</p> <p>* Record review: 10 out of 10 ERT qualifications covering the period of May 2021 to April 2022 confirm all ERT members have the required certifications.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states a) the requirement for emergency responders to be trained on an annual basis b) training is dependent on responsibilities during an emergency.</p> <p>* Record review: ERT training material (Doc. No.: Nil, Rev. Nil, Issue date: November 10, 2021) demonstrates conformance with Training Guidance.</p> <p>* Record review: 10 out of 10 ERT member personnel files demonstrate the necessary training records are a) available b) accurate.</p> <p>* Management interview: Quality Vice Manager a) details what training is required for emergency responders b) confirms when the last training is held.</p> <p>* Worker interview: 2 out of 2 ERT members a) confirm they are trained on an annual basis b) state when they are last trained and on which topic c) explain their role and function during emergency situations.</p> <p>* Supporting evidence reference(s): N/A</p>

## OCCUPATIONAL INJURY AND ILLNESS

Question #	VAP-B3.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	

Question #	VAP-B3.1b
Question Text	All required permits, programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Major Non-Conformance

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## Validated Audit Report

Conclusion	<p>Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards.</p> <p>[Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35/中华人民共和国职业病防治法 (2018修正) 第三十五条。 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results./ 对从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。]</p>
Data points	<ul style="list-style-type: none"> <li>* Site observation: a) Required postings are a.a) current a.b) located in public view. b) No clinic.</li> <li>* Record review: Special equipment and operator certificate management procedure (Doc. No.: Nil, Rev. Nil, Issue date: Nil) states the documented process to ensure permits are renewed before current permits expire.</li> <li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li> <li>* Record review: 6 out of 6 first responders' certificates covering the period May 2021 to April 2022 demonstrate conformance with legal requirements.</li> <li>* Record review: 20 out of 20 occupational health examination reports covering the period May 2021 to April 2022 demonstrate the facility provides pre-job and on-the-job occupational health examination to all workers who engaged in occupational hazardous conditions, no off-the-job occupational medical examination for the workers work with occupational disease hazards.</li> <li>* Management interview: Quality Vice Manager confirms a) no off-the-job occupational medical examination for the workers work with occupational disease hazards. and state a) which occupational safety reports are required b) details what testing is done c) explains which process is in place to ensure reports are renewed before current reports expire d) confirms which department is in charge of the reports, frequency to renew or apply.</li> <li>* Worker interview: 6 out of 6 workers work with occupational hazardous state that the facility provides pre-job and on-the-job occupational health examination to all workers who engaged in occupational hazardous conditions, but no off-the-job occupational medical examination for them.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-B3.2a
Question Text	Have there been injuries, accidents or illnesses in the last 3 years?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B3.2b
Question Text	Investigations to determine root cause(s) and implement corrective/preventive actions for work-related injuries/illness in the past three years are performed and documented, communicated to affected employees, and tracked to closure
Rating	Conformance
Conclusion	Investigations to determine root cause(s) and implement corrective and preventive actions for work-related injuries and illness in the past three years are performed, documented and communicated to affected employees, and tracked to closure.



## Validated Audit Report

Data points	<p>* Record review: Accident Investigation and Reporting Procedure (Doc. No.: A-03-053-M0C0000, Rev. V3, Issue date: July 9, 2021) states: a) the system for workers to report health and safety a.a) incidents a.b) near-misses b) the system to b.a) investigate b.b) track b.c) minimize the potential for future occurrence c) reportable accidents d) non reportable accidents.</p> <p>* Record review: 3 out of 3 occupational injury and illness data records covering the period May 2019 to April 2022 demonstrate a) occupational Injury and illness data is available b) for last 3 years c) includes surveillance data.</p> <p>* Record review: 3 out of 3 occupational injury and illness investigation reports covering the period May 2019 to April 2022 demonstrate a) all accidents and near misses are: b) investigated c) analyzed d) have corrective and preventive actions and any additional actions which are taken if the corrective actions are off track.</p> <p>* Record review: Injury and accident trends analysis record (Doc. No.: Nil, Rev. Nil, Issue date: January 9, 2022) states: a) the detail of the occupational Injury and illness trends for each year b) corrective actions are identified.</p> <p>* Management interview: Quality Vice Manager a) states how many accidents they have had in the last year b) details how they investigate accidents c) explains have they minimize the risk of re-occurrence d) States which workers profiles related to occupational injury and illness are maintained by designated staff.</p> <p>* Worker interview: 20 out of 20 workers a) confirm investigations are performed after an accident to their knowledge b) state changes to the workstation are made and communicated to affected workers after an accident c) confirm they are aware of legal required medical surveillance practices.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-B3.3
Question Text	An effective first aid process and adequate number of trained first responders are available to provide initial medical treatment for injured or ill workers is in place
Rating	Conformance
Conclusion	An effective first aid process and adequate number of trained first responders are available to provide initial medical treatment for injured or ill workers is in place.
Data points	<p>* Site observation: a) First Aid responders are easily identifiable by colored attire and work area signage b) No onsite occupational medical clinic, it is not required by law c) alternative resources including outside medical services are communicated to employees.</p> <p>* Record review: First Aid Management Procedure (Doc. No.: A-03-063-M0C0000, Rev. v1, Issue date: October 15, 2021) states a) the detail of effective first response indicating severity of medical emergency response (first aid, local external hospital) b) a team of trained and certified first responders covering every shift.</p> <p>* Management interview: Quality Vice Manager a) states the types of medical emergency response personnel on-site b) explains the medical emergency response procedures c) confirms medical emergency response personnel have the required certificates d) details where the closest hospital is located in case of severe emergency.</p> <p>* Worker interview: 20 out of 20 workers (including 2 emergency responders) a) explain what to do in the event they are injured or become ill on the job b) state how to identify the first aider in their section c) state no infirmary is in the facility and know where is the nearest hospital d) state what to do when a medical emergency is severe (first responders only).</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-B3.4
Question Text	Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available to employees in designated areas. The kits have adequate supplies and are inspected on a monthly basis
Rating	Conformance
Conclusion	Adequate first response equipment and first aid kits to provide medical treatment for injured or ill workers are available to employees in designated areas. The kits have adequate supplies and are inspected on a daily basis.

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Data points	<ul style="list-style-type: none"> <li>* Site observation: a) appropriate and completely stocked placed first aid kits are available in designated locations b) First aid kits are unlocked or if locked, first responder can access the key at all times. c) Appropriate and well maintained first response equipment is available in designated locations.</li> <li>* Record review: First Aid Management Procedure (Doc. No.: A-03-063-M0C0000, Rev. v1, Issue date: October 15, 2021) states a) the details of the a.a) inspection a.b) maintenance a.c) upkeep a.d) stocking of all b) first response equipment c) first aid kits d) requiring at least weekly for all inspections.</li> <li>* Record review: 12 out of 12 first response equipment inspection lists covering the period May 2021 to April 2022 demonstrate a) all first aid kits have an inventory list b) inspection tracking records are up to date c) first aid kits are completely stocked d) Checked at least monthly for all inspections.</li> <li>* Management interview: Quality Vice Manager a) states how first aid kits are stocked and inspected b) Explains how first response equipment is maintained and inspected c) states who can access the supplies.</li> <li>* Worker interview: 20 out of 20 workers a) confirm where nearest first aid kit is in their section b) confirm where nearest first response equipment is in their section c) state who can access the supplies.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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### INDUSTRIAL HYGIENE

Question #	VAP-B4.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	

Question #	VAP-B4.1b
Question Text	All required permits, licenses and testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	<b>Major Non-Conformance</b>
Conclusion	Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. No permit and license is required by local law. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors. [Provisions on the Supervision and Administration of Occupational Health at Work Sites (2012), Article 20/工作场所职业卫生监督管理规定 (2012) 第二十条 The employer with serious occupational disease hazards shall entrust the accredited occupational health technical service institutions to conduct present situation assessment of occupational disease hazards once every three years at least besides meet the previous article./ 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。]

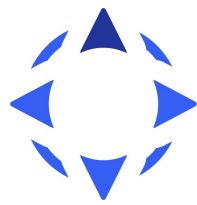
Data points	<ul style="list-style-type: none"> <li>* Record review: Special equipment and operator certificate management procedure (Doc. No.: Nil, Rev. Nil, Issue date: Nil) states the documented process to ensure permits are renewed before current permits expire.</li> <li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li> <li>* Record review: No license is required by local law.</li> <li>* Record review: No Permit is required by local law.</li> <li>* Record review: Occupational Disease Hazards Factors Testing and Evaluation Report (Doc. No.: AYDS-检字2021第07132号, issue date: July 2021, expire date: Nil) demonstrates conformance with legal requirements.</li> <li>* Record review: No evaluations of the occupational disease hazard factors.</li> <li>* Management interview: Quality Vice Manager confirms a) No evaluations of the occupational disease hazard factors. b) states no industrial hygiene permit and license is required c) details what testing is done d) explains which process is in place to ensure permits are renewed before current permits expire e) confirms EHS department is in charge of the license/permit, frequency to renew or apply.</li> <li>* Supporting evidence reference(s): Nil</li> </ul>
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Question #	VAP-B4.2
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## Validated Audit Report

Question Text	Adequate and effective process to be identify, evaluate, and control, according to the hierarchy of controls, worker exposure to chemical, biological and physical agents.
Rating	Conformance
Conclusion	Adequate and effective process to be identify, evaluate, and control, according to the hierarchy of controls, worker exposure to chemical, biological and physical agents.
Data points	<p>* Site observation: a) adequate controls to reduce or eliminate worker exposure to chemical, biological and physical agents are in place b) effective including proper design, engineering controls, administrative controls and adequate and effective PPE c) during normal working hour, workplace is free from obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings.</p> <p>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C000, Rev. V6, Issue date: June 15, 2021) states to a) identify b) assess c) control using the Hierarchy of Controls potential exposure to. c.a) chemical c.b) biological c.c) physical agents. d) the requirement the risk assessment is updated when a Significant Change occurs d) the risk assessment must include exposure to multiple chemicals e) a risk assessment is completed e.a) when a new agent is introduced into the work environment, e.b) when an existing process is changed that may trigger an employee health risk.</p> <p>* Record review: 4 out of 4 Industrial Hygiene risk assessments covering the period of May 2021 to April 2022 demonstrate consistency with Hazard Identification, Risk Assessment and Control Management Procedure.</p> <p>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C000, Rev. V6, Issue date: June 15, 2021) states the details of the program: a) to control the identified potential hazards to a.a) chemical a.b) biological a.c), physical agents b) follows the hierarchy of controls c) the requirement to regularly verify the effectiveness of implemented controls d) the requirement of corrective actions if the effectiveness is insufficient.</p> <p>* Record review: 4 out of 4 effectiveness evaluation reports covering the period May 2019 to April 2022 demonstrate a) the evaluations occur regularly as per Hazard Identification, Risk Assessment and Control Management Procedure b) effectiveness of all implemented controls has have been analyzed c) resulting in corrective actions are identified. d) evaluations have occurred at least every 3 years or when a Significant Change occurred.</p> <p>* Record review: 4 out of 4 medical surveillance records covering the period May 2019 to April 2022 demonstrate a) medical surveillance records pertaining to respiratory evaluations to determine if worker is being harmed from exposure to agents, b) determining hearing loss c) any other medical concerns d) related to specific job activities.</p> <p>* Management interview: Quality Vice Manager a) states what Industrial hygiene risk assessment program is implemented b) details what potential hazards there are in the facility c) explains how the potential hazards are controlled and minimized.</p> <p>* Worker interview: 20 out of 20 workers a) state what controls management has implemented on their position to minimize the risk of a.a) chemical a.b) biological a.c) physical agents.</p> <p>* Supporting evidence reference(s): N/A</p>

### PHYSICALLY DEMANDING WORK

Question #	VAP-B5.1a
Question Text	Is there physically demanding work?
Rating	Yes
Conclusion	
Data points	

Question #	VAP-B5.1b
Question Text	Worker exposure to the hazards of physically demanding work is identified, assessed and controlled adequately and effectively
Rating	Conformance
Conclusion	Worker exposure to the hazards of physically demanding work is identified, assessed and controlled adequately and effectively.

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Data points	<ul style="list-style-type: none"> <li>* Site observation: a) Adequate controls to reduce or eliminate physically demanding work a.a) are in place and effective a.b) including proper design, engineering controls and administrative controls.</li> <li>* Record review: Ergonomics Assessment Management Regulation (Doc. No.: A-04-107-Q0C0000, Rev. V1, Issue date: October 18, 2021) states a) a risk assessment b) to identify and assess the potential hazards of physically demanding work c) the requirement the risk assessment is updated when a Significant Change occurs.</li> <li>* Record review: Physically demanding work risk assessment record (Reference document number Nil, Rev. Nil, date: November 18, 2021) demonstrates consistency with Ergonomics Management Regulation.</li> <li>* Record review: Ergonomics improvement case (Doc. No.: Nil, Rev. Nil, Issue date: December 20, 2021) states the details of the program: a) to control the identified potential hazards to physically demanding work b) follows the hierarchy of controls c) the requirement to regularly verify the effectiveness of implemented controls d) it encourages and respond to early reporting of discomfort.</li> <li>* Record reviews: 5 out of 5 grievance records state that worker are satisfaction with their work conditions.</li> <li>* Management interview: Quality Vice Manager a) states how the facility analyzes physically demanding work b) confirms the risks are identified c) details what controls are in place to minimize these risks.</li> <li>* Worker interview: 20 out of 20 workers a) state adequate efforts by the facility to control ergonomic hazards are made b) confirm they are pain free c) detail what was done to reduce any physical pain now or in the past they were experiencing.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>MACHINE SAFEGUARDING</b>	
Question #	VAP-B6.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	No
Conclusion	
Data points	
Question #	VAP-B6.2a
Question Text	Are there machine hazards?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B6.2b
Question Text	An adequate and effective machine-safeguarding program is implemented, and workers operate machinery safely
Rating	<b>Major Non-Conformance</b>
Conclusion	<p>A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A#.</p> <p>[General Rules of Design on Health and Safety of Production Facility (GB 5083-1999), article 6.1.2/生产设备安全卫生设计总则 ( GB 5083-1999 ) 第6.1.2条 Necessary safeguard shall be installed for all moving parts that are accessible to the operator during machine operation./ 对操作人员在设备运行时可能触及的可动零部件，必须配置必要的安全防护装置。]</p>



# Validated Audit Report

Data points	<ul style="list-style-type: none"> <li>* Site observation: a) All machines have adequate emergency stops b) Most machines have adequate safeguards c) All workers operate machine safely d) The safety guards for two grading machines are broken.</li> <li>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C000, Rev. V6, Issue date: June 15, 2021) states a) a risk assessment with b) to identify and assess the potential hazards of machinery hazards c) the requirement the risk assessment is done c.a) pre-purchase c.b) pre-installation c.c) during operation.</li> <li>* Record review: 2 out of 2 machinery safety risk assessments covering the period May 2019 to April 2022 demonstrate consistency with Hazard Identification, Risk Assessment and Control Management Procedure.</li> <li>* Record review: Safety Risk Assessment Report (Doc. No.: Nil, Rev. Nil, Issue date: January 4, 2022) states the details of the program: a) to control the identified potential hazards to machinery safety b) the requirement for b.a) regular inspection b.b) preventive maintenance of b.b.a) machine b.b.b) safeguards b.b.c) emergency stops.</li> <li>* Record review: 10 out of 10 preventive maintenance records covering the period May 2021 to April 2022 demonstrate the Auditee implements the process as per Hazard Identification and Risk Assessment Procedure.</li> <li>* Record review: 6 out of 6 work instructions covering the period May 2021 to April 2022 demonstrate a) availability within proximity of the machine b) in a language understood by the worker.</li> <li>* Management interview: Quality Vice Manager confirms a) The safety guards for two grading machines are broken. b) details the overview of the machine risk assessment and safeguarding program c) confirms how the facility ensures workers understand the safe use of the machine they operate.</li> <li>* Worker interview: 20 out of 20 workers a) confirm they understand a.a) the safeguards a.b) use of emergency stops for their machine b) detail how and when they had last training on the safety aspects of the machine they operate.</li> <li>* Worker interview: 2 out of 2 workers in grading workshop state that the safety guards for two grading machines are broken.</li> <li>* Supporting evidence reference(s): B6.2.jpg</li> </ul>
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**FOOD, SANITATION AND HOUSING**

Question #	VAP-B7.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B7.1b
Question Text	All required health & safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times
Rating	Major Non-Conformance

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Conclusion	<p>Required health &amp; safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings.</p> <p>[Provisions on the Supervision and Administration of Fire Protection of Construction Projects (2012 Revision), Article 13/建设工程消防监督管理规定（2012修订）第十三条 For a people-intensive premise under one of the following circumstances, the construction unit thereof shall apply to the fire protection division of the public security organ for the fire protection design review, and shall apply for a fire protection as-built acceptance to the fire protection division of the public security organ which has issued the fire protection design review opinions after the completion of the construction project.(5) It is...the staff collective dormitory of a labor-intensive enterprise with the total construction area of more than 1,000 square meters./ 对具有下列情形之一的人员密集场所，建设单位应当向公安机关消防机构申请消防设计审核，并在建设工程竣工后向出具消防设计审核意见的公安机关消防机构申请消防验收：（五）建筑总面积大于一千平方米的.....劳动密集型企业员工集体宿舍； Administrative Measures for Protecting against and Mitigating Thunder and Lightning Disasters (2013 Amendment), Article 19/防雷减灾管理办法（2013修改）第十九条。 After being put into use, a regular inspection system shall be established for the thunder protection devices. Thunder protection devices shall be tested once a year./ 投入使用后的防雷装置实行定期检测制度。防雷装置应当每年检测一次。]</p>
Data points	<ul style="list-style-type: none"> <li>* Site observation: Valid hygiene permit is placed on site.</li> <li>* Record review: Special equipment and operator certificate management procedure (Doc. No.: Nil, Rev. Nil, Issue date: Nil) states the documented process to ensure permits are renewed before current permits expire.</li> <li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li> <li>* Record review: Drinking water test report (Report number: ZQJC检字(2021)第0713006, issued date: August 18, 2021, Expiry date: Nil) demonstrates conformance with legal requirements and no contaminant risk for workers.</li> <li>* Record review: No fire license or register certificate for two 6-storey dormitory buildings.</li> <li>* Record review: No test report for thunder protection devices of two 6-storey dormitory buildings.</li> <li>* Record review: Food Operation Permit (Permit number: JY34419050032098, Issue date: November 27, 2020, Expiry date: November 26, 2025, issued by: Dongguan Food and Drug Administration Bureau) is maintained and accurate.</li> <li>* Record review: 6 out of 6 Cooks Health Certificates covering the period May 2021 to April 2022 demonstrate all certificates are maintained and accurate.</li> <li>* Management interview: Quality Vice Manager confirms a) No test report for thunder protection devices of two 6-storey dormitory buildings. and b) states which health &amp; safety permits are required related to food, sanitation and housing c) details what testing is done d) explains which process is in place to ensure permits are renewed before current permits expire e) confirms which department is in charge of the license/permit, frequency to renew or apply f) No fire license or register certificate for two 6-storey dormitory buildings.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-B7.2a
Question Text	Are there dormitories?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B7.2b
Question Text	Dormitories are clean, safe, well maintained, and meet international housing standards
Rating	Major Non-Conformance

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<p>Conclusion</p>	<p>Dormitories are clean, safe and well maintained and most facilities meet housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5/建筑设计防火规范 (GB 50016-2014, 2018修正) 第10.3.5条 Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements:1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place./ 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;]</p>
<p>Data points</p>	<p>* Site observation: a) Dormitory is a.a) clean a.b) properly maintained b) Stairwells are clear c) Building is heated in the winter d) Windows provide light and ventilation e) There is adequate lighting f) Safe and sufficient electricity sockets are provided g) Sufficient space is available for each worker h) Individually secured storage accommodations are available i) All facilities are i.a) separated by gender i.b) adequate in number j) Lodging and cooking facilities are separate k) Adequate domestic waste disposal facilities are available l) Pest control is adequate m) Adequate m.a) fire and heat detection m.b) alarm and notification m.c) fire suppression n) Number of exit routes from each floor are adequate o) exit route doors are o.a) accessible o.b) well-marked o.c) unlocked from the inside p) number of first aid kits available are adequate q) no rent apartment is used q) no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>* Record review: Dormitory Management Regulation (Doc. No.: A-03-002-M0C0000, Rev. V13, Issue date: July 6, 2021) states the detail of a) the cleaning and sanitation program b) the pest control program.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states a) the detail of the preventive maintenance program b) including emergency response supporting facilities.</p> <p>* Record review: Hazard Identification and Risk Assessment Procedure (Doc. No.: A-04-088-Q0C000, Rev. V6, Issue date: June 15, 2021) states a) a risk assessment for dormitory b) the requirement the risk assessment is updated when a Significant Change occurs c) the requirement of on-site inspections d) includes emergency procedures for dormitory.</p> <p>* Record review: Hazard Source Identified and Risk assessment Record (Doc. No.: Nil, Rev. Nil, Issue date: January 4, 2022) demonstrates consistency with Hazard Identification and Risk Assessment Procedure.</p> <p>* Record review: 12 out of 12 dormitory inspection reports covering the period May 2021 to April 2022 demonstrate consistency with Hazard Identification and Risk Assessment Procedure.</p> <p>* Record review: 12 out of 12 sanitation program tracking records covering the period May 2021 to April 2022 demonstrate the sanitation program is implemented consistently and conform Dormitory Management Regulation.</p> <p>* Record review: 12 out of 12 pest control logs covering the period May 2021 to April 2022 demonstrate the pest control program is implemented consistently and conform Dormitory Management Regulation.</p> <p>* Record review: 12 out of 12 building preventive maintenance program logs covering the period May 2021 to April 2022 demonstrate the preventive maintenance program is implemented consistently and conform Dormitory Management Regulation.</p> <p>* Management interview: Quality Vice Manager confirms a) no exit sign for exits of the dormitory buildings. and b) states how the facility ensures dormitory standards c) details how the facility tracks c.a) the inspections c.b) resulting actions. d) confirms the facility performs for dormitory, d.a) a risk assessment d.b) on-site inspections d.c) emergency drills.</p> <p>* Worker interview: 20 out of 20 workers who live in the dormitory confirm the dormitory facilities are a) adequate b) clean c) safe d) how on-site inspections are performed e) how emergency drills are performed f) no exit sign for exits of the dormitory buildings.</p> <p>* Supporting evidence reference(s): B7.2.jpg</p>
<p>Question #</p>	<p>VAP-B7.3a</p>
<p>Question Text</p>	<p>Are there bathrooms, employee spaces, canteens (cafeterias), and/or food areas ?</p>
<p>Rating</p>	<p>Yes</p>
<p>Conclusion</p>	<p></p>
<p>Data points</p>	<p></p>

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## Validated Audit Report

Question #	VAP-B7.3b
Question Text	Facility bathrooms, employee spaces, canteens (cafeterias), food areas are safe, are clean, well maintained, and well managed
Rating	Conformance
Conclusion	Facility bathrooms, employee spaces, cafeterias, food areas are safe, clean, well maintained, and well managed.
Data points	<p>* Site observation: a) bathrooms, employee spaces, cafeterias, food areas are a.a) safe a.b) clean a.c) well maintained b) Exits are adequate for the number of workers served c) Canteens are provided with adequate hand washing facilities d) Pest control is adequate f) Food service workers wear f.a) masks f.b) hairnets f.c) gloves to prevent food contamination. g) Adequate g.a) fire and heat detection g.b) alarm and notification g.c) fire suppression systems are in place h) Number of exit routes from each floor are adequate i) Exit route doors are i.a) accessible i.b) well-marked i.c) unlocked from the inside j) Maximum occupancy number is posted on site k) Adequate number of first kits are available l) Food storage and preparation areas are clean m) Food is stored properly n) Raw and cooked food are n.a) stored separately n.b) food kept covered, o) Food is used or disposed of before the marked expiration date.</p> <p>* Record review: Dormitory Management Regulation (Doc. No.: A-03-002-M0C0000, Rev. V13, Issue date: July 6, 2021) states the detail of a) the cleaning and sanitation program b) the pest control program.</p> <p>* Record review: Emergency Preparedness and Response Control Procedure (Doc. No.: A-04-003-M0C052, Rev. V20, Issue date: December 16, 2020) states a) the detail of the preventive maintenance program b) including emergency response supporting facilities.</p> <p>* Record review: Kitchen And Canteen Management Regulation (Doc. No.: W-14.2-0003, Rev. V2.0, Issue date: August 25, 2021) states the detail of a) Safe food handling procedures b) hygiene standards for b.a) refrigeration b.b) storage b.c) preparation areas.</p> <p>* Record review: 12 out of 12 safe food handling and hygiene tracking records covering the period May 2021 to April 2022 demonstrate the sanitation program is implemented consistently and conform Kitchen and Canteen Management Regulation.</p> <p>* Record review: 12 out of 12 sanitation program tracking records covering the period May 2021 to April 2022 demonstrate the sanitation program is implemented consistently and conform Kitchen and Canteen Management Regulation.</p> <p>* Record review: 12 out of 12 pest control logs covering the period May 2021 to April 2022 demonstrate the pest control program is implemented consistently and conform Kitchen and Canteen Management Regulation.</p> <p>* Record review: 12 out of 12 building preventive maintenance program logs covering the period May 2021 to April 2022 demonstrate the preventive maintenance program is implemented consistently and conform Kitchen and Canteen Management Regulation.</p> <p>* Management interview: Quality Vice Manager a) states how the bedrooms, kitchen and canteen standards are a) bathrooms b)employee spaces, c.a) implemented c.b) maintained d) details how records are kept.</p> <p>* Worker interview: 20 out of 20 workers a) confirm the bedroom, kitchen and canteen a.a) is clean a.b) food preparation is hygienic.</p> <p>* Supporting evidence reference(s): N/A</p>
<b>HEALTH AND SAFETY COMMUNICATION</b>	
Question #	VAP-B8.1
Question Text	Workers are provided with appropriate clearly posted workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to. Workers shall be encouraged to raise any health and safety concerns without retaliation.
Rating	Conformance
Conclusion	Workers are provided with appropriate clearly posted workplace health and safety information and training in a language the worker can understand for all identified workplace hazards that workers are exposed to. Workers are encouraged to raise any health and safety concerns without retaliation.



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### Data points

\* Site observation: a) Health and Safety communication is clearly posted in a location accessible by workers b) Appropriate signs, placards and labels identifying hazards are clearly visible for: b.a) chemical hazards b.b) physical hazards b.c) biological hazards b.d) vehicular hazards c) a mechanism to raise safety concerns is clearly visible d) visitors received muster point communication.

\* Record review: Education and Training Management Regulation (Doc. No.: A-04-001-M0C0052, Rev. V1, Issue date: October 22, 2021) states: a) all communications and training must be in a language understood by the worker b) training program following good training program practice c) Training program includes minimum training requirements c.a) mechanical c.b) electrical c.c) chemical c.d) fire c.e) correct use of appropriate PPE c.f) Types of potential emergencies that may occur at their work location c.g) what to do during an emergency, including Internal and external muster points. c.h) Machine safety and the use of safeguards and emergency stops. c.i) Reporting injuries and illnesses c.j) Hazardous atmospheres and confined space work procedures prior to entry of confined spaces c.k) Lock out-tag out procedures c.m) training identified in the training needs assessment d) Training is provided to all workers d.a) prior to the beginning of work d.b) regularly thereafter as per the training program. e) Workers responsible for storage, clean up or disposal of chemical releases should receive specialized training. f) Occupational health professionals and first responders are trained by external agencies or trained and certified by internal qualified occupational health professionals such as medical doctor where permitted by local law.

\* Record review: Training needs analysis record (Doc. No.: Nil, Rev. Nil, Issue date: December 20, 2020) states the detailed a) analysis b) methodology, c) results d) is conform to Education and Training Management Regulation.

\* Record review: Training plan of year 2022 (Doc. No.: Nil, Rev. Nil, Issue date: December 30, 2021) states the topics consistent with the training needs analysis and conform to Education and Training Management Regulation.

\* Record review: 12 out of 12 Health & Safety training materials covering the period May 2021 to April 2022 demonstrate conformance with Education and Training Management Regulation, Training needs analysis record and Training plan.

\* Record review: 12 out of 12 Health & Safety training records covering the period May 2021 to April 2022 demonstrate all workers are trained in conformance with Education and Training Management Regulation, Training needs analysis record and Training plan.

\* Record review: Information Communication Control Procedure (Doc. No.: A-04-037-Q0C0000, Rev. 1, Issue date: October 17, 2021) states a) the detail of Health & Safety communication program to workers and employees for all identified workplace hazards that workers are exposed to b) the requirement for potential workplace hazards that workers are exposed to be clearly posted in the facility accessible by workers c) all hazards present at the site and action promoting of an H&S workplace are communicated. d) Internal and external muster points are communicated to all employees and visitors e) the detailed program to receive, review and respond to safety concerns reported. f) Mechanisms to encourage workers to raise safety concerns g) the requirement to evaluate the effectiveness of the programs for: g.a) Health & Safety training g.b) Health & Safety communication g.c) program to receive safety concerns.

\* Record review: 12 out of 12 Health & Safety training and effectiveness evaluation reports covering the period May 2021 to April 2022 demonstrate the evaluations occur regularly as per Education and Training Management Regulation & Information Communication Control Procedure.

\* Record review: 12 out of 12 safety concern logs covering the period May 2021 to April 2022 demonstrate safety concerns are encouraged and raised as per Information Communication Control Procedure.

\* Record review: 12 out of 12 Health & Safety communication records covering the period May 2021 to April 2022 demonstrate Information Communication Control Procedure without retaliation is implemented consistently.

\* Management interview: Quality Vice Manager a) states how management ensures workers understand the language used in training and communication b) Explains the details of the H&S training program c) Details the minimum training requirements c.a) What training is provided c.b) When the last training is held d) Explains how new employees are trained e) States what specialized training is provided e.a) Workers responsible for storage, clean up or disposal e.b) Workers handling chemicals and hazardous substances e.c) First responders e.d) Occupational health professionals f) details what, how and how frequent they communicate with workers g) states how workers can raise any health and safety concerns without retaliation h) explains how these safety concerns are evaluated, addressed and communicated to workers.

\* Worker interview: 20 out of 20 workers a) confirm they understand the language used in a.a) training a.b) communications a.c) which languages are used b) confirm the date and content of the last training c) explain how they are trained as new employee d) confirm when they are training on: d.a) the correct use of appropriate PPE d.b) types of potential emergencies that may occur at their work location d.c) what to do during an emergency, including Internal and external muster points, d.d) machine safety and the use of safeguards and emergency stops, d.e) Reporting injuries and illnesses d.f) Hazardous atmospheres and confined space work procedures prior to entry of confined spaces d.g) Lock out-tag out procedures e) confirm when the last communication was and in what form it was given f) explain what is communicated to them and it is effective g) detail what H&S information is posted h) state

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	how they are encouraged to raise safety concerns h.a) what system is available to raise any health and safety concerns without retaliation h.b) confirm raised safety concerns have been acted on. * Supporting evidence reference(s): N/A
<b>HEALTH &amp; SAFETY PROVISION GOOD PRACTICES</b>	
Question #	VAP-B9.1a
Question Text	Are there Health & Safety provision good practices?
Rating	No
Conclusion	
Data points	
<b>C) Environment</b>	
<b>ENVIRONMENTAL PERMITS AND REPORTING</b>	
Question #	VAP-C1.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C1.1b
Question Text	The facility has obtained all required environmental permits, approvals, licenses and registrations
Rating	Conformance
Conclusion	All required environmental permits, approvals, licenses and registrations are obtained.
Data points	<ul style="list-style-type: none"> <li>* Record review: All required environmental permits, approvals, licenses and registrations are obtained.</li> <li>* Record review: Special equipment and operator certificate management procedure (Doc. No.: Nil, Rev. Nil, Issue date: Nil) states the documented process to ensure permits, approvals, registrations or licenses, environmental impact assessments and tests reports are renewed before current permits, approvals, registrations or licenses, environmental impact assessments and tests reports expire.</li> <li>* Record review: Conformance tracking system Permit/ license/ test report conformance calendar (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) shows when permits, approvals, registrations or licenses, environmental impact assessments and tests reports expire and when the renewal process must be initiated as well as when it was initiated.</li> <li>* Record review: Environment Impact Assessment report(Doc. No.: 2016第11347号, Issue date: Aug 2016, Expiry date: Nil) indicates the facility has assessed the environment impact factors and draft the preventive action as per legal requirement.</li> <li>* Record review: Pollutant Discharge Registration Record (Doc. No.: 91441900707846675C001U, Issue date: July 2, 2020, Expiry date: July 1, 2025) indicates that the facility has obtained legally required permits.</li> <li>* Management interview: Quality Vice Manager a) states which environmental permits, approvals, registrations and tests, environmental impact assessments reports are required b) details what testing is done c) explains which process is in place to ensure permits are renewed before current permits expire d) states the operations that have triggered or may potentially trigger an environmental permit.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-C1.2a
Question Text	Is environmental reporting required?
Rating	No
Conclusion	

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Data points	
<b>POLLUTION PREVENTION AND RESOURCE REDUCTION</b>	
Question #	VAP-C2.1
Question Text	Adequate and effective programs, including objectives and targets, to identify, manage, minimize or eliminate at the source emissions and discharges of pollutants and generation of waste and conserve the use of natural resources
Rating	Conformance
Conclusion	Adequate and effective programs, including objectives and targets, to identify, manage, minimize or eliminate at the source emissions and discharges of pollutants and generation of waste and conserve the use of natural resources.
Data points	<p>* Record review: Resource And Energy Management Procedure (Doc. No.: Nil, Rev. V1, Issue date: October 17, 2021) states a) the details of the programs to a.a) identify a.b) manage a.c) minimize or eliminate a.c.a) at the source emissions a.c.b) discharges of pollutants a.c.c) generation of waste a.c.d) conserve the use of natural resources b) a materiality assessment to b.a) identify significant environmental aspects b.b) establish programs for b.b.a) monitoring b.b.b) control of these aspects b.c) updated when changes in machinery, process, facility or materials used occur c) clear annual objectives and targets are set for each identified material emission source not entailing excessive cost.</p> <p>* Record review: Energy conservation and emission reduction assessment report (Doc. No.: Nil, Rev. Nil, Issue date: March 9, 2022) reveals conformance with resource and energy management procedure.</p> <p>* Management interview: Quality Vice Manager a) explains their materiality analysis b) explains which pollution reduction and resource conservation programs have been developed and implemented c) states what reduction objectives have been set for each of the material environmental impacts c.a) Reduce resource consumption c.b) Reduce waste and pollution generation c.c) Capture or reuse materials that would otherwise enter waste streams.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) a) confirm they are aware of programs to conserve resources and minimize generation of wastes of all types b) detail their role and can describe their involvement in the program.</p> <p>* Supporting evidence reference(s): N/A</p>
<b>HAZARDOUS SUBSTANCES</b>	
Question #	VAP-C3.1a
Question Text	Are any hazardous substances (including wastes) used or stored on site?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C3.1b
Question Text	Hazardous substances including wastes are properly categorized, labeled, handled, stored, transported and disposed using government-approved and/or licensed vendors
Rating	Major Non-Conformance



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Conclusion	<p>Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment), Article 3.6.12/建筑设计防火规范 (GB 50016-2014, 2018修正) 3.6.12 Facilities capable of preventing liquids from flooding and spreading shall be provided in storage storing Class A, B and C liquids. Stores of items that are subject to fire and explosion in case of damp shall be protected against water immersion./ 甲、乙、丙类液体仓库应设置防止液体流散的设施。遇湿会发生燃烧爆炸的物品仓库应采取防止水浸渍的措施。 Standard on Pollution Control of Hazardous Waste Storage (GB 18597-2001 / XG 1-2013), Article 6.3.9/危险废物贮存污染控制标准 (GB 18597-2001 / XG 1-2013) 6.3.9 Hazardous waste storage shall be wind-proof, rain-proof and sun-proof./ 危险废物堆要防风、防雨、防晒。]</p>
Data points	<p>* Site observation: a) Hazardous substances are adequately and effectively a.a) categorized a.b) handled a.c) moved within the facility b) Access to hazardous substances is controlled c) potential employee exposure methods are adequate and effective c.a) segregation c.b) secondary containment c.c) ventilation, fire protection c.d) appropriate storage cabinets d) Hazard signage and information is available at the points of d.a) use d.b) storage. e) no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop f) One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p> <p>* Record review: Chemical Control Procedure (Doc. No.: A-04-093-Q0C0000, Rev. V5, Issue date: November 16, 2020) states a) the detail of the process for a.a) reception a.b) storage a.c) dispensing a.d) use a.e) track a.f) review a.g) approve the use of b) all hazardous chemicals c) all new purchases of hazardous chemicals prior to use which includes c.a) a thorough evaluation of less hazardous or non-hazardous alternatives.</p> <p>* Record review: 12 out of 12 material information sheets covering the period May 2021 to April 2022 demonstrate: a) hazardous material information is available b) in a language understood by the worker.</p> <p>* Record review: 2 out of 2 Inventory records covering the period of May 2021 to April 2022 demonstrates accurate chemical inventory records are maintained.</p> <p>* Record review: 12 out of 12 inspection records covering the period May 2021 to April 2022 demonstrate inspection records of hazardous substances and their points of storage and use are accurate and maintained.</p> <p>* Record review: 4 out of 4 manifests and shipping papers covering the period May 2021 to April 2022 demonstrate hazardous substances inventory is accurate and maintained.</p> <p>* Record review: 2 out of 2 Hazardous substances vendor licenses covering the period of May 2021 to April 2022 demonstrate only vendors approved and licensed by the local regulatory authorities are used.</p> <p>* Management interview: Quality Vice Manager confirms a) No secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. b) One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#. c) states what hazardous substances are used on site d) details what the requirements are on the use and storage of hazard substances e) explains what procedures are to manage and minimize the risk of the hazardous substances e) States what process is used to select the purchase of new hazardous chemicals.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) state what hazardous substances procedures are in place for their specific duties.</p> <p>* Worker interview: 2 out of 2 workers in warehouse and grading workshop state a)no secondary containment for four buckets of thinner stored on 1st floor of production building B# and one bucket of alcohol stored in grading workshop b) one bucket of hydraulic oil is stored in the open area.</p> <p>* Supporting evidence reference(s): C3.1-1.jpg; C3.1-2.jpg; C3.1-3.jpg</p>
Question #	VAP-C3.2
Question Text	Hazardous waste is safely disposed of including a disposal supplier(s) assessment
Rating	Conformance
Conclusion	Hazardous waste is safely disposed of including a disposal supplier assessment.

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Data points	<p>* Record review: Waste Management Procedure (Doc. No.: a-04-039-Q0C0000, Rev. V10, Issue date: November 16, 2020) states a) the details for the a.a) safe return and disposal of hazardous waste b) A periodic assessment to evaluate b.a) hazardous waste handler b.b) hazardous waste transporter) b.c) s complying with contract terms and conditions c) Assessments should occur c.a) at least every 3 years c.b) when there is a significant change d) The assessment must occur before a new vendor is selected e) a corrective action plan process to address nonconformances.</p> <p>* Record review: Reduction program &amp; tracking record (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track.</p> <p>* Record review: Hazardous waste vendor assessment report (Report Number: Nil, Rev. Nil, Issue date: November 10, 2021) demonstrates hazardous waste vendor is conforming law and contractual requirements.</p> <p>* Management interview: Quality Vice Manager confirms that waste batteries stored in the hazardous waste warehouse more than one year and a) states how many hazardous waste transporters and handlers are used b) explains what process is used to verify these vendors on their site c) confirms when the last assessment of a waste handler and transporter occurred d) details which authorized waste transporter and vendors are used and how manifests are kept e) states what reduction programs are in place to: e.a) Reduce resource consumption e.b) Reduce waste and pollution generation e.c) Capture or reuse materials that would otherwise enter waste streams.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) confirm the facility does not conduct vendor assessment for any hazardous waste vendors and state how waste shipments are documented.</p> <p>* Supporting evidence reference(s): N/A</p>
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<b>SOLID WASTE</b>	
Question #	VAP-C4.1a
Question Text	Is solid waste generated or stored on site?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C4.1b
Question Text	Solid waste is managed and responsibly disposed of
Rating	Conformance
Conclusion	Solid waste is managed and responsibly disposed of.

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# Validated Audit Report

Data points	<p>* Site observation: a) Waste is adequately and effectively a.a) categorized a.b) handled a.c) stored a.d) transported within the facility b) access to waste is controlled c) potential employee exposure methods are adequate and effective c.a) segregation c.b) secondary containment c.c) ventilation c.d) fire protection d) Hazard signage and information is appropriately available e) waste characterization and response information are appropriately available f) reduction programs are visible.</p> <p>* Record review: Waste Management Procedure (Doc. No.: a-04-039-Q0C0000, Rev. V10, Issue date: November 16, 2020) states a) the detail of the process for a.a) storage a.b) handling a.c) transportation a.d) disposal a.e) track a.f) review a.g) approve the disposal of all waste.</p> <p>* Record review: 12 out of 12 material information sheets covering the period May 2021 to April 2022 demonstrate: a) material information is available b) in a language understood by the worker.</p> <p>* Record review: 12 out of 12 inventory records covering the period May 2021 to April 2022 demonstrate accurate chemical inventory records are maintained.</p> <p>* Record review: 12 out of 12 inspection records covering the period May 2021 to April 2022 demonstrate inspection records of substances and their points of storage and use are accurate and maintained.</p> <p>* Record review: 12 out of 12 manifest and shipping papers covering the period May 2021 to April 2022 demonstrate chemical inventory is accurate and maintained.</p> <p>* Record review: Reduction program &amp; tracking record (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track.</p> <p>* Management interview: Quality Vice Manager a) states what types of waste are stored on site b) explains what the requirements are for the storage of waste c) states what procedures are in place to manage and minimize the risk of the storage of waste d) details which authorized waste transporter and vendors are used and how manifests are kept e) states what reduction programs are in place to: e.a) Reduce resource consumption e.b) Reduce waste and pollution generation e.c) Capture or reuse materials that would otherwise enter waste streams.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) state the waste procedures for their specific function.</p> <p>* Supporting evidence reference(s): N/A</p>
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## AIR EMISSIONS

Question #	VAP-C5.1a
Question Text	Are there any air emissions AND/OR air emissions requirements?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C5.1b
Question Text	Air emissions are routinely monitored and air emission control systems are routinely monitored for performance.
Rating	Conformance
Conclusion	Air emissions are routinely monitored, and air emission control systems are routinely monitored for performance.

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Data points	<p>* Site observation: a) Equipment for air emission treatment is a.a) well maintained a.b) appropriate a.c) identified b) Air emission are b.a) treated prior to discharge b.b) in accordance with permit requirement c) Reduction programs are visible within the Auditee d) No ozone depleting substances are used in the production and equipment in the facility.</p> <p>* Record review: Water, Waste and Noise Control Procedure (Doc. No.: A-04-042-Q0C0000, Rev. V14, Issue date: October 26, 2020) states a) the detail of the process for a.a) air emission treatment a.b) air emission discharge a.c) track a.d) review a.e) approve the use of discharge of all air emissions b) emergency response actions are defined in case the on-site air emissions treatment system malfunctions c) air emissions treatment equipment have c.a) a routine preventive maintenance program c.b) System efficiency monitoring program c.c) A program to evaluate the integrity of existing process air emission systems d) A specific individual or individuals within the facility organization who will be responsible for all aspects of process air emission treatment.</p> <p>* Record review: 12 out of 12 air emission equipment inspection records covering the period May 2021 to April 2022 demonstrate inspection records of air emissions are performed and conform Waste and Noise Control Procedure.</p> <p>* Record review: Water, Waste gas and noise test report (Doc. No.: ZQJC检字 ( 2021 ) 第713006号, Issue date: August 18, 2021, Expiry date: Nil) demonstrates testing is performed and conform Waste and Noise Control Procedure.</p> <p>* Record review: 3 out of 3 preventive maintenance records covering the period May 2021 to April 2022 demonstrate preventative maintenance is carried out consistent with Waste and Noise Control Procedure.</p> <p>* Record review: Reduction program &amp; tracking record (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track.</p> <p>* Record review: Emissions list (Doc. No.: Nil, Rev. Nil, Issue date: December 30, 2021) details all of the site's air emissions.</p> <p>* Management interview: Quality Vice Manager a) states what air emissions are generated on site b) explains how these are treated c) states what program is in place to routinely monitor equipment and emissions d) confirms emissions are within regulated constituent limits e) states what action plan is in place to ensure compliance as soon as possible which authorized waste transporter and vendors are used and how manifests are kept f) states what reduction programs are in place to: f.a) Reduce resource consumption f.b) Reduce waste and pollution generation f.c) Capture or reuse materials that would otherwise enter waste streams. He confirms no ozone depleting substances are used in the production and equipment in the facility.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) state how they would respond to incidences of untreated air emissions.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-C5.2a
Question Text	Are there any environmental noise requirements?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C5.2b
Question Text	Environmental noise levels are within regulatory limits
Rating	Conformance
Conclusion	Environmental noise levels are within regulatory limits.



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Data points	<ul style="list-style-type: none"> <li>* Site observation: No excessive boundary noise.</li> <li>* Record review: Water, Waste and Noise Control Procedure (Doc. No.: A-04-042-Q0C0000, Rev. V14, Issue date: October 26, 2020) states a) the detail of the process for environmental noise control including boundary noise b) sources are b.a) Identified b.b) Evaluated b.c) Routinely monitored b.d) Controlled b.e) tracked b.f) reviewed c) boundary-noise-control devices are installed c.a) a routine preventive maintenance program c.b) System efficiency monitoring program c.c) A program to evaluate the integrity of existing process air emission systems d) A specific individual or individuals within the facility organization who will be responsible for all aspects of process air emission treatment.</li> <li>* Record review: Waste gas and noise test report(Doc. No.: ZQJC检字 ( 2021 ) 第713006号, Issue date: August 18, 2021, Expiry date: Nil) demonstrates testing is performed and conform Waste and Noise Control Procedure.</li> <li>* Record review: 3 out of 3 preventive maintenance records covering the period May 2021 to April 2022 demonstrate preventative maintenance is carried out consistent with Waste and Noise Control Procedure.</li> <li>* Management interview: Quality Vice Manager a) states what environmental noise complaints b) details the program in place to monitor environmental noise.</li> <li>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) state the controls for environmental noise (equipment).</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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### MATERIALS RESTRICTIONS

Question #	VAP-C6.1a
Question Text	Are there any legal Material Restrictions requirements?
Rating	Yes
Conclusion	
Data points	

Question #	VAP-C6.1b
Question Text	Adequate and effective program is in place for Materials Restrictions as a formal part of the procurement and manufacturing processes
Rating	Conformance
Conclusion	Adequate and effective program is in place for Materials Restrictions as a formal part of the procurement and manufacturing processes.

Data points	<ul style="list-style-type: none"> <li>* Record review: Hazardous Substances Compliance Control Procedure (Doc. No.: A-04-084-Q0C0000, Rev. V40, Issue date: February 28, 2022) states the material restrictions process is managed and implemented at corporate level. It states a) the detail of the material restrictions process a.a) to measure a.b) document the chemical composition of products including: b) a documented review process for comparing customer requirements to own specifications c) a documented process to ensure c.a) materials c.b) packaging c.c) components procured c.d) in conformance with customer requirements d) documented requirements for conformance with the Material Restrictions required to its material /parts Suppliers e) statements and certificates of conformance and analytical data to its customers upon request are provided.</li> <li>* Record review: 5 out of 5 chemical composition of products and specifications covering the period May 2019 to April 2022 demonstrate consistency with Product Hazardous Substances Management Standard and the applicable requirements.</li> <li>* Record review: 5 out of 5 statements covering the period May 2019 to April 2022 demonstrate consistency with Hazardous Substances Compliance Control Procedure and the applicable requirements.</li> <li>* Record review: 5 out of 5 material restriction monitoring &amp; reporting records covering the period May 2019 to April 2022 demonstrate a) consistency with Hazardous Substances Compliance Control Procedure b) are available for the last 3 years.</li> <li>* Management interview: Quality Vice Manager a) states how they ensure conformance in Material Restriction with requirements b) details the formal program in place including b.a) product testing b.b) documentation requirements.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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### WATER MANAGEMENT

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## Validated Audit Report

Question #	VAP-C7.1
Question Text	Adequate and effective procedures are in place to document, characterize, and monitor water sources, water discharge and control channels of contamination
Rating	Conformance
Conclusion	Adequate and effective procedures are in place to document, characterize, and monitor water sources, water discharge and control channels of contamination.
Data points	<p>* Site observation: a) Water withdrawal and discharge points do not appear to heavily impact local waterbodies b) Equipment are compatible with the waste materials being stored and transported c) Industrial and sanitary wastewater is treated in accordance with permit requirements d) Wastewater treatment system is d.a) in operation d.b) appears to be operating effectively e) wastewater is discharged to a municipal treatment system f) Reduction programs are visible g) Water channels look free of contamination h) Water channels are protected from contamination i) appropriate emergency response equipment are in place to respond to a possible water channel contamination.</p> <p>* Record review: Water Control Procedure (Doc. No.: A-04-005-M0C0053, Rev. V7, Issue date: June 28, 2021) states a) the detail of the process for water discharge a.a) storage a.b) treatment a.c) discharge a.d) track a.e) review a.f) approve the use of discharge of all wastewater discharge b) emergency response actions are defined in case the wastewater treatment system malfunctions c) wastewater treatment equipment have c.a) a routine preventive maintenance program c.b) System efficiency monitoring program c.c) A program to evaluate the integrity of existing process wastewater collection systems d) A specific individual or individuals within the facility organization who will be responsible for all aspects of process wastewater discharge e) Adequate and effective procedures to control internal water channel contamination including: e.a) Potential contamination sources to water channels are identified e.b) Adequate and effective emergency response plan to control water channel contamination e.c) Appropriate emergency response equipment inspection and maintenance process e.d) Investigation of water channel contamination and corrective/preventive action plan.</p> <p>* Record review: Reduction program &amp; tracking record (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track.</p> <p>* Record review: 12 out of 12 material information sheets covering the period May 2021 to April 2022 demonstrate: a) material information is available b) in a language understood by the worker.</p> <p>* Record review: 12 out of 12 water channel contamination logs covering the period May 2019 to April 2022 demonstrate a) identification of water channel contamination b) sources with a description of water channel contamination c) available for past 3 years.</p> <p>* Record review: 12 out of 12 inspection records of wastewater and their points of storage covering the period May 2021 to April 2022 demonstrate inspection records of wastewater and their points of storage are accurate and maintained.</p> <p>* Record review: 12 out of 12 wastewater inventory records covering the period May 2021 to April 2022 demonstrate wastewater inventory records are maintained.</p> <p>* Management interview: Quality Vice Manager a) states where the facility's water source is b) explains how a water risk assessment was carried c) details what wastewater sources are on site d) states how these are treated, disposed of e) explains what program is in place to monitor compliance f) explains the basics of wastewater reduction program g) states what procedures are in place to prevent contamination of internal water channels h) details how water channel contamination is prevented.</p> <p>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) state what is their role and responsibilities on water discharge and control of water channel contamination.</p> <p>* Supporting evidence reference(s): N/A</p>

### ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Question #	VAP-C8.1a
Question Text	Is electricity or fuel directly purchased?
Rating	Yes
Conclusion	
Data points	

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Question #	VAP-C8.1b
Question Text	Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked and Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked, documented and publicly reported against the corporate greenhouse gas reduction goal
Rating	Conformance
Conclusion	Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked and Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked, documented and publicly reported against the corporate greenhouse gas reduction goal.
Data points	<ul style="list-style-type: none"> <li>* Site observation: There is no significant energy consumption or GHG emissions at the Auditee that are not tracked and documented.</li> <li>* Record review: GHG Inventory Management Procedure (Doc. No.: No:A-03-064-M0C0000, Rev. V1, Issue date: October 15, 2021) states the requirement and process to a) document the sources of electricity and other energy a.a) On-site combustion a.b) Purchased electricity a.c) Renewable energy use b) create a baseline of energy use (by source) c) create an emissions statement including c.a) value of Scope 1 and 2 emissions c.b) a description of its boundary and source.</li> <li>* Record review: 5 out of 5 purchased diesel records covering the period May 2021 to April 2022 demonstrate energy and GHG baseline data is available as per GHG Inventory Management Regulation.</li> <li>* Record review: 2 out of 2 energy and GHG baseline records covering the period May 2021 to April 2022 demonstrate energy and GHG baseline data is available as per GHG Inventory Management Regulation.</li> <li>* Management interview: Quality Vice Manager a) states how all on-site combustion, purchased electricity, and natural gas a.a) are tracked a.b) are available b) explains how electricity and other energy consumption has been converted into GHG emissions c) confirms GHG is calculated at the facility level c.a) provides evidence that GHG are c.a.a) aggregated c.a.b) reported.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-C8.2
Question Text	Cost-effective methods to improve energy efficiency and to minimize their energy consumption and all relevant Scopes 1 and 2 greenhouse gas (GHG) emissions are implemented
Rating	Conformance
Conclusion	Cost-effective methods to improve energy efficiency and to minimize their energy consumption and all relevant Scopes 1 and 2 greenhouse gas (GHG) emissions are implemented.
Data points	<ul style="list-style-type: none"> <li>* Site observation: a) Technology strategies to minimize energy consumption and GHG emissions are visible. b) Reduction programs are visible.</li> <li>* Record review: Reduction program &amp; tracking record (Doc. No.: Nil, Rev. Nil, Issue date: April 29, 2022) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track e) Roles and responsibilities f) Reporting.</li> <li>* Record review: 2 out of 2 energy and GHG emissions inventory records covering the period May 2021 to April 2022 demonstrate accurate energy and GHG emissions data is available.</li> <li>* Record review: 2 out of 2 inspection records of energy and GHG emissions and their points of use covering the period May 2021 to April 2022 demonstrate inspection data of energy and GHG emissions and their points of use is available.</li> <li>* Management interview: Quality Vice Manager a) states what energy and GHG reduction programs they have b) confirms what the energy and GHG reduction annual targets are c) details what progress has been made and if progress is off track d) states how they will correct to ensure progress is achieved in reporting period.</li> <li>* Worker interview: 20 out of 20 workers (including 2 workers responsible for resource reduction and control) a) state the energy reduction targets and progress b) confirm their Awareness of the company's commitment to energy efficiency and GHG emissions.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>ENVIRONMENT PROVISION GOOD PRACTICES</b>	
Question #	VAP-C9.1a
Question Text	Are there Environment provisions good practices?

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Rating	No
Conclusion	
Data points	
<b>D) Ethics</b>	
<b>BUSINESS INTEGRITY</b>	
Question #	VAP-D1.1
Question Text	Adequate and effective policy and procedures to uphold the highest standards of integrity in all business interactions with a zero tolerance to any and all forms of bribery, corruption, extortion and embezzlement
Rating	Conformance
Conclusion	Adequate and effective policy and procedures to uphold the highest standards of integrity in all business interactions with a zero tolerance to any and all forms of bribery, corruption, extortion and embezzlement are in place. Appropriate investigations and sanctions occur when there is an alleged violation.
Data points	<p>* Record review: Clean Operation and Ethic Control Procedure (Doc. No.: A-03-057-M0C0000, Rev.: 1, Issue date: October 11, 2021) states a) the commitment to uphold the highest standards of integrity b) in all business interactions c) with a zero tolerance to d) any and all forms of bribery, corruption, extortion and embezzlement. And it states the detailed a) Adequate and effective monitoring program to regularly monitor its business to ensure: a.a) Workers or agents do not make or accept improper offers, bribes or undue/improper advantage a.b) records verifying is not falsified and accurate. a.c) fair business, advertising and competition a.d) protection of identity and retaliation a.e) protection of personal information b) investigation process when there is an alleged violation including misrepresentation by b.a) workers b.b) managers b.c) their agents. c) Appropriate sanctions c.a) when a violation is confirmed c.b) preventive action plan d) procedure to protect workers and employees from retribution for d.a) refusing to do anything in Non-conformance with the "highest standard of integrity" policy d.b) communicate/volunteer their decision.</p> <p>* Record review: Ethics investigation report is not available for no alleged violation.</p> <p>* Record review: 20 out of 20 personnel files confirm a) no negative consequence for any worker/employee refusing to do anything in Non-conformance with the "highest standard of integrity" policy b) the policy was communicated in an understandable form.</p> <p>* Management interview: Management Department Manager a) states the policy on zero tolerance on all forms of bribery, corruption, extortion and embezzlement b) details the process by which employees and workers are protected b.a) from refusing to do anything in Non-conformance with the "highest standard of integrity" policy b.b) communicating/volunteering their decision c) confirms how this policy is regularly c.a) monitored c.b) investigated d) explains how the facility d.a) investigates an allegation of bribery d.b) what action follows depending on the result.</p> <p>* Worker interview: 20 out of 20 workers a) state the policy on zero tolerance on all forms of bribery, corruption, extortion and embezzlement b) confirm they can refuse to do anything in non-conformance to the 'highest standard of integrity' policy without retribution.</p> <p>* Supporting evidence reference(s): N/A</p>
<b>NO IMPROPER ADVANTAGE</b>	
Question #	VAP-D2.1
Question Text	No identified risk or evidence of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted.
Rating	Conformance
Conclusion	No identified risk or evidence of bribes or obtaining undue or improper advantage being promised, offered, authorized, given or accepted.



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Data points	<p>* Record review: Clean Operation and Ethic Control Procedure (Doc. No.: A-03-057-M0C0000, Rev.: 1, Issue date: October 11, 2021) states the detailed process to ensure a) Gifts to or from suppliers and customers is not allowed b) Bribes or other methods of obtaining undue or improper advantage are not being b.a) promised b.b) offered b.b) authorized b.d) given b.e) accepted c) encourages workers and employees to declare conflicts of interest d) Ensures compliance with anti-corruption laws.</p> <p>* Record review: Declaration form of conflict of interest (Doc. No.: Nil, Rev.: Nil, Date: March 15,2022) demonstrates Clean Operation and Ethic Control Procedure is implemented.</p> <p>* Management interview: Management Department Manager a) states gifts to or from suppliers and customers is not allowed b) details what the company policy states regarding bribery c) explains how workers are encouraged to declare conflict of interest d) states how this conflict of interest is recorded.</p> <p>* Worker interview: 20 out of 20 workers a) state gifts to or from suppliers and customers is not allowed b) detail what the company policy states regarding bribery c) explain how they are encouraged to declare conflict of interest d) state how this conflict of interest is recorded in their personnel file.</p> <p>* Supporting evidence reference(s): N/A</p>
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### DISCLOSURE OF INFORMATION

Question #	VAP-D3.1
Question Text	No identified risk or evidence of misreporting, record falsification, misrepresentation or evidence of communicating inaccurate information to the public
Rating	Conformance
Conclusion	No identified risk or evidence of misreporting, record falsification, misrepresentation or evidence of communicating inaccurate information to the public.
Data points	<p>* Site observation: Publicly communicated company information is posted and is accurate.</p> <p>* Record review: Information Disclosure Control Procedure (Doc. No.: A-03-061-M0C0000, Rev.: 1, Issue date: October 11, 2021) states a) the commitment to ensure b) Public information must not make false or misleading statements about the Auditee's b.a) products b.b) services b.c) opportunities b.d) position and it states a) to ensure public statements are not false or misleading b) Ensure that all business dealings should be b.a) transparently performed b.b) accurately reflected on the business books and records c) requirement to audit records verifying they are accurate d) investigate misrepresentation by d.a) workers d.b) managers d.c) their agents.</p> <p>* Record review: Annual financial report (Document No: 信衡会审字 [2022]第1122号, Issue date: April 25, 2022) confirms accurate information to the public.</p> <p>* Management interview: Management Department Manager a) states what safeguards they have in place to ensure misrepresentation is prevented by a.a) workers a.b) managers a.c) their agents b) explains which reports they provide government agencies at what time c) states which third party financial audit firm is used to perform the annual financial Audit d) explains what procedures and checks are in place to ensure public information is accurate and not misleading.</p> <p>* Worker interview: 20 out of 20 workers confirm that job posting, and recruitment information is accurate and not misleading.</p> <p>* Supporting evidence reference(s): N/A</p>

### INTELLECTUAL PROPERTY

Question #	VAP-D4.1
Question Text	No identified risk or evidence of Intellectual Property or business information loss or unauthorized disclosure (the Auditee's own and that of their customers/suppliers)
Rating	Conformance
Conclusion	No identified risk or evidence of Intellectual Property or business information loss or unauthorized disclosure (the Auditee's own and that of their customers and suppliers).

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Data points	<p>* Site observation: IP and business information are visibly protected.</p> <p>* Record review: Intellectual Property Protection Control Procedure (Doc. No.: A-04-108-Q0C00000, Rev.: 1, Issue date: December 27, 2021) a) states the procedures they have to identify and protect IP b) explains which protection agreements are in place c) details the procedure in place to notify customers/suppliers if violation should occur d) explains the procedure in place to investigate unauthorized disclosures and loss of intellectual property IP information.</p> <p>* Record review: 20 out of 20 employment contracts demonstrate non-disclosure agreement for workers and management is in place.</p> <p>* Management interview: Management Department Manager a) states the procedures they have to identify and protect IP b) explains which protection agreements are in place c) details the procedure in place to notify customers/suppliers if violation should occur d) explains the procedure in place to investigate unauthorized disclosures and loss of intellectual property IP information.</p> <p>* Worker interview: 2 out of 2 office workers a) state what IP is b) detail what measures are in place within their job/function/responsibility to protect IP c) explain what measures are in place protect information from suppliers and customers.</p> <p>* Supporting evidence reference(s): N/A</p>
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### FAIR BUSINESS, ADVERTISING AND COMPETITION

Question #	VAP-D5.1
Question Text	No identified risk or evidence of non-conformance with fair business, advertising and competition standards
Rating	Conformance
Conclusion	No identified risk or evidence of non-conformance with fair business, advertising and competition standards.
Data points	<p>* Record review: Clean Operation and Ethic Control Procedure (Doc. No.: A-03-057-M0C00000, Rev.: 1, Issue date: October 11, 2021) states a) the detailed process ensuring standards are upheld for a.a) fair business a.b) advertising a.c) competition standards are upheld b) Safeguards are in place to prevent collusion with other companies on b.a) product pricing b.b) other factors that could reduce competition c) Monitoring procedures are in place related to c.a) fair business c.b) advertising c.c) competition are in place.</p> <p>* Management interview: Management Department Manager states the detail of the prohibition of collusion and fair business policy.</p> <p>* Worker interview: 2 out of 2 office workers state the detail of the prohibition of collusion and fair business.</p> <p>* Supporting evidence reference(s): N/A</p>

### PROTECTION OF IDENTITY AND NON-RETALIATION

Question #	VAP-D6.1
Question Text	No identified risk or evidence of retaliation or reduced protection of identity
Rating	Conformance
Conclusion	No identified risk or evidence of retaliation or reduced protection of identity.
Data points	<p>* Record review: Clean Operation and Ethic Control Procedure (Doc. No.: A-03-057-M0C00000, Rev.: 1, Issue date: October 11, 2021) states the detail process for ensuring a) protection of identity b) non-retaliation c) safeguards are in place to prevent c.a) reduced protection of identity c.b) retaliation d) Monitoring procedures related to d.a) protection of identity d.b) retaliation.</p> <p>* Management interview: Management Department Manager states how retaliation is prevented and monitored.</p> <p>* Worker interview: 20 out of 20 workers a) state how management has assured them of non-retaliation b) confirm they are unaware of any retaliation case to their knowledge.</p> <p>* Supporting evidence reference(s): N/A</p>

### RESPONSIBLE SOURCING OF MINERALS

Question #	VAP-D7.1a
Question Text	Are Tin, Tungsten, Tantalum and Gold (3TG) mineral material or containing components used?
Rating	Yes
Conclusion	

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Data points	
Question #	VAP-D7.1b
Question Text	Adequate and effective Conflict Minerals policy and management program that is designed and implemented to reasonably assure that the tantalum, tin, tungsten and gold (3TG) in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Due Diligence Guidance) or an equivalent and recognized due diligence framework.
Rating	Conformance
Conclusion	Adequate and effective Conflict Minerals policy and management program that is designed and implemented to reasonably assure that the tantalum, tin, tungsten and gold (3TG) in the products they manufacture are sourced in a way consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas (OECD Due Diligence Guidance).
Data points	<ul style="list-style-type: none"> <li>* Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) states: a) the detail of the Conflict Minerals policy and management system a.a) Identifying a senior management person responsible for implementation of the Management System a.b) Including 3TG due diligence sourcing requirements in written agreements and contracts with suppliers a.c) Mitigate any risks identified in accordance with the OECD Due Diligence Guidance, including a.c.a) the suspension or termination of business relationships with suppliers when risk mitigation is unsuccessful b) Reviewing the Management System b.a) on an annual basis b.b) to ensure conformance b.c) improve where process improvements have been identified.</li> <li>* Record review: 5 out of 5 3TG due diligence reports covering the period of May 2017 to April 2022 demonstrate a) due diligence records related to conflict minerals a.a) maintained a.b) are available the last five (5) years b) show consistent implementation of RBA Management Manual.</li> <li>* Record review: 5 out of 5 3TG supplier mitigation plans covering the period May 2017 to April 2022 demonstrate the investigations following any risk is identified conform RBA Management Manual.</li> <li>* Record Review: Annual RBA Management Review (Doc. No: Nil, Rev. Nil, Issue date: December 23,2021) confirms an annual review of the program is undertaken and consistent with RBA Management Manual.</li> <li>* Management interview: Management Department Manager a) details the Conflict Minerals policy and Conflict Minerals and management system b) explains what action is taken when suppliers are not in conformance b.a) with the Conflict Minerals Policy b.b) a potentially conflict-affected source.</li> <li>* Worker interview: 2 out of 2 staff in procurement a) detail the Conflict Minerals policy and Conflict Minerals and management system b) explain what action is taken when suppliers are not in conformance b.a) with the Conflict Minerals Policy b.b) a potentially conflict-affected source.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>PRIVACY</b>	
Question #	VAP-D8.1
Question Text	No identified risk or evidence of unauthorized disclosure of personal information
Rating	Conformance
Conclusion	No identified risk or evidence of unauthorized disclosure of personal information.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Personal information is visibly protected.</li> <li>* Record review: Information Disclosure Control Procedure (Doc. No.: A-03-061-M0C0000, Rev.: 1, Issue date: October 11, 2021) states the detailed process to a) protect of personal information b) Safeguards to prevent unauthorized disclosure of personal information c) Monitoring procedures related to protection of personal information.</li> <li>* Management interview: Management Department Manager states what measures are in place to protect privacy.</li> <li>* Worker interview: 20 out of 20 workers state how their personal information is protected.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>ETHICS PROVISION GOOD PRACTICES</b>	
Question #	VAP-D9.1a
Question Text	Are there Ethics provisions good practices?
Rating	No

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# Validated Audit Report

Conclusion	
Data points	
<b>E) Mgt. System</b>	
<b>CERTIFICATIONS</b>	
Question #	VAP-E0.1a
Question Text	Does the facility have credible, accredited third-party certified (valid) management systems for - A) Labor (e.g. SA8000), B) Health and Safety (e.g. OHSAS18001), C) Environment (e.g. ISO14001), D) Ethics?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-E0.1b
Question Text	List all credible, accredited third-party certified (valid) management systems the facility has obtained
Rating	Health & Safety: Occupational Health And Safety Management System ISO45001:2018 certificate (certificate number: 04120S30144R3M, Issue date: December 3, 2020, Expiry date: December 21, 2023, issued by: CTI)  Environment: Environmental Management System ISO14001:2015 certificate (certificate number: 04120E30150R4M, Issue date: April 14,2021, Expiry date: April 13,2024, issued by: CTI)
Conclusion	
Data points	
<b>COMPANY COMMITMENT</b>	
Question #	VAP-E1.1
Question Text	Adequate and effective policies/Code(s) that are endorsed by executive management, covering: A) Labor B) Health & Safety C) Environment and D) Ethics
Rating	Conformance
Conclusion	Adequate and effective policies that are endorsed by executive management, covering: A) Labor and D) Ethics.
Data points	* Site observation: a) corporate social and environmental responsibility policy statements b) in a language understood by each worker c) is visible to all workers. * Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) contains: a) a statement a.a) Labor a.b) Ethics b) endorsed by c) the highest-level manager at the facility with a d) stated commitment to d.a) regulatory compliance d.b) other requirements d.c) continuous improvement e) The statement is appropriate for the nature and scope of the operations. * Management interview: QC Vice Manager details the policy. * Worker interview: 20 out of 20 workers detail the policy. * Supporting evidence reference(s): N/A
<b>MANAGEMENT ACCOUNTABILITY AND RESPONSIBILITY</b>	
Question #	VAP-E2.1
Question Text	Responsibilities are adequately defined for all employees/workers (sr managers to workers) for implementation of mgmt systems, and for compliance with laws and codes pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics
Rating	Conformance

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Conclusion	Responsibilities and authorities are adequately and effectively defined and assigned for all employees/workers (senior managers to workers) for implementation of management systems, and for compliance with laws, regulations and codes pertaining to: A) Labor and D) Ethics.
Data points	<ul style="list-style-type: none"><li>* Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) states: a) QC Vice General Manager is assigned responsibility for implementing programs b) to ensure compliance with b.a) laws and regulations b.b) the requirements of the RBA c) is authorized to implement c.a) programs c.b) procedures c.c) corrective actions d) detailed d.a) responsibilities d.b) authority of d.c) each organizational level d.d) are documented d.e) for normal situations d.f) for emergency situations for e.a) Labor e.b) Ethics.</li><li>* Management interview: QC Vice Manager a) states the a.a) responsibilities a.b) authorities of a.c) each level within the organization a.d) including the senior executive a.e) for each component b) explains how b.a) responsibilities b.b) reporting lines are b.c) documented b.d) communicated c) states under what conditions an override for the management system would be allowed.</li><li>* Worker interview: 20 out of 20 workers a) detail their responsibilities a.a) against each of the components b) state QC Vice General Manager is the responsible management representative b.a) for each component.</li><li>* Supporting evidence reference(s): N/A</li></ul>
Question #	VAP-E2.2
Question Text	An adequate and effective management review and continuous improvement process for A) Labor, B) Health & Safety, C) Environment and D) Ethics performance and management systems is established
Rating	Conformance
Conclusion	An adequate and effective management review and continuous improvement process for A) Labor and D) Ethics performance and management systems is established.
Data points	<ul style="list-style-type: none"><li>* Record review: RBA Management Manual (Doc. No.: A-06-002-Q0C0000, Rev.: 31, Issue date: April 24,2022) states the detailed annual management system review process.</li><li>* Record review: Management review meeting minute (Doc. No: Nil, Rev.: Nil, Issue date: February 18,2022) provides a.a) Labor a.b) Ethics b) detail of management review meeting presentation materials/analysis/data. c) demonstrates the code c.a) implementation performance c.b) management system d) is reviewed and consistent with RBA Management Manual.</li><li>* Record review: 3 out of 3 management systems action plans covering the period May 2021 to April 2022 demonstrate the review of the code implementation performance and management systems, the analysis, the results and the actions based on the analysis results, current status of the actions and any additional actions which are taken if the corrective actions are off track.</li><li>* Management interview: QC Vice Manager a) explains the management system review process b) confirms the last meeting was held on February 18,2022) c) details what actions result from the review.</li><li>* Supporting evidence reference(s): N/A</li></ul>
<b>LEGAL AND CUSTOMER REQUIREMENTS</b>	
Question #	VAP-E3.1
Question Text	An adequate and effective compliance process to monitor, identify and ensure compliance with applicable laws and regulations and customer requirements pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics is established
Rating	Conformance
Conclusion	An adequate and effective compliance process to monitor, identify and ensure compliance with applicable laws and regulations and customer requirements pertaining to: A) Labor and D) Ethics is established.



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Data points	<ul style="list-style-type: none"> <li>* Record review: Compliance Obligation Determination and Compliance Control Procedure (Doc. No.: A-04-086-Q0C0000, Rev.: 5, Issue date: October 11,2021) states the detailed compliance process for a.a) Labor a.b) Ethics b) quarterly c) to maintain a current understanding of applicable c.a) legal c.b) customer requirements d) Identify e) Track f) Assess g) Integrate h) Implement i) Record.</li> <li>* Record review: Conformance register and tracking system (Doc. No: Nil, Rev. Nil, Issue date: April 15,2022) shows when reports are submitted timely.</li> <li>* Record review: 6 out of 6 changed procedures covering the period May 2021 to April 2022 confirm the consistent implementation of Compliance Obligation Determination and Compliance Control Procedure.</li> <li>* Management interview: QC Vice Manager a) details the process to a.a) monitor a.b) review a.c) integrate a.d) implement a.e) legal and customer requirements b) explains how the responsible person is knowledgeable about the requirements.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
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### RISK ASSESSMENT AND RISK MANAGEMENT

Question #	VAP-E4.1
Question Text	An adequate and effective risk management process to identify, assess, and minimize/mitigate/control its risks in the areas of: A) Labor B) Health & Safety C) Environment and D) Ethics is in place
Rating	Conformance
Conclusion	An adequate and effective risk management process to identify, assess, and minimize, mitigate and control its risks in the areas of: A) Labor and D) Ethics is in place.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Control measures are in place for identified risks.</li> <li>* Record review: Hazard Identification and Risk Assessment Control Procedure (Doc. No.: A-04-088-Q0C0000, Rev.: 5, Issue date: October 14,2021) states the detailed risk assessment process for a.a) Labor a.b) Ethics b) using the hierarchy of controls or equivalent process to c) identify the most significant risks including c.a) applicable legal requirements c.b) applicable customer requirements d) the requirement to update risk assessment when there is a Significant Change e) Any identified risk has an action plan e.a) to minimize such risk e.b) procedural controls and improvement objective f) Effectiveness of controls f.a) is evaluated f.b) on an annual basis.</li> <li>* Record review: Risk assessment form (Document No.: Nil, Rev.: Nil, Issue date: January 12, 2022) demonstrates consistent implementation of Hazard Identification and Risk Assessment Control Procedure.</li> <li>* Record review: Risk assessment action plan (Document No.: Nil, Rev.: Nil, Issue date: January 13, 2022) demonstrates the review of the code implementation performance and management systems, the analysis, the results and the actions based on the analysis results, current status of the actions and any additional actions which are taken if the corrective actions are off track.</li> <li>* Management interview: QC Vice Manager a) details the risk assessment process b) confirms when the last risk assessment was carried out c) explains what c.a) controls c.b) corrective actions are in place.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>

### IMPROVEMENT OBJECTIVES

Question #	VAP-E5.1
Question Text	An adequate and effective performance management process for A) Labor, B) Health & Safety, and D) Ethics, including setting performance (improvement) objectives and targets, developing and implementing improvement plans, regularly reviewing progress toward achieving targets, and making appropriate adjustments if needed is in place
Rating	Conformance
Conclusion	An adequate and effective performance management process for A) Labor and D) Ethics, including setting performance objectives and targets, developing and implementing improvement plans, regularly reviewing progress toward achieving targets, and making appropriate adjustments if needed is in place.

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Data points	<ul style="list-style-type: none"> <li>* Record review: Management Objectives and Implementation Control Procedure (Doc. No.: A-04-034-Q0C0000, Rev.: 9, Issue date: June 20, 2021) states a) the detailed annual performance management process for a.a) Labor a.b) Ethics b) with formal b.b) communicated targets c) Additional action plans if target is off track.</li> <li>* Record review: Targets and indicators monitoring report (Doc. No: Nil, Rev.: Nil, Issue date: January 13, 2022) states for a.a) Labor a.b) Ethics b) the formal target c) performance tracking d) adjustment to be made when off track e) confirms consistent implementation of Management Objectives and Implementation Control Procedure.</li> <li>* Management interview: QC Vice Manager confirms the targets relevant to them for a.a) Labor a.b) Ethics b) detail the objectives/targets process c) confirm the current targets d) state when the last review was.</li> <li>* Worker interview: 20 out of 20 workers a) state the targets relevant to them for a.a) Labor a.b) Ethics.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>TRAINING</b>	
Question #	VAP-E6.1
Question Text	An adequate and effective training process is established for all managers/workers on all policy/procedures/job related aspects and performance targets related to A) Labor, C) Environment, and D) Ethics
Rating	Conformance
Conclusion	An adequate and effective training process is established for all managers and workers on all policy, procedures, job related aspects and performance targets related to A) Labor, C) Environment and D) Ethics.
Data points	<ul style="list-style-type: none"> <li>* Record review: Human Resource Control Procedure (Doc. No.: A-04-002-M0C0052, Rev.: 7, Issue date: October 11, 2021) states the detailed training process a.a) Labor a.b) Environment a.c) Ethics b.a) for managers b.b) workers and employees b.c) New employees including c) New employee orientation plan d) Training needs analysis e) Training plan f) Training material g) Training records h) Training frequency i) Training efficiency verification.</li> <li>* Record review: Training needs analysis (Doc. No: Nil, Rev. Nil, Issue date: January 12, 2022) states the detailed a) analysis b) methodology c) results d) covers the minimum required topics in d.a) Labor d.b) Ethics.</li> <li>* Record review: Training plan (Doc. No: Nil, Rev. Nil, Issue date: January 13, 2022) states a) the topics consistent with the training needs analysis b) type of training, c) frequency d) training material references.</li> <li>* Record review: 6 out of 6 training materials covering the period May 2021 to April 2022 demonstrate all training materials are available as per the training plan.</li> <li>* Record review: 6 out of 6 training records covering the period May 2021 to April 2022 demonstrate all employees and workers are trained a) prior to the beginning of work b) regularly thereafter as per the training plan.</li> <li>* Record review: 6 out of 6 training effectiveness evaluations covering the period May 2021 to April 2022 demonstrate a) training is effective the evaluations b) occur regularly training plan.</li> <li>* Management interview: QC Vice Manager a) explains how training needs are analyzed b) states how new employees are trained c) provides an overview of the training process.</li> <li>* Worker interview: 20 out of 20 workers a) state how they were trained when they joined the company b) confirm when the last training was c) detail the content of the last training d) state how the company verifies if they understand the training material.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>COMMUNICATION</b>	
Question #	VAP-E7.1
Question Text	An adequate and effective worker/manager, supplier and customer communication/reporting process for A) Labor, C) Environment, and D) Ethics policies, practices and performance is established
Rating	Conformance
Conclusion	An adequate and effective worker/manager, supplier and customer communication process for A) Labor, C) Environment and D) Ethics policies, practices and performance is established.

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Data points	<p>* Record review: Participate in Communication and Negotiation Control Procedure (Doc. No.: A-04-037-Q0C0000, Rev.: 10, Issue date: October 11, 2021) states the detailed communications process for a.a) Labor a.b) Environment a.c) Ethics to b) worker/manager b.a) with the minimum required topics c) Suppliers c.a) Correspondence to Supplier management c.b) Contract terms and conditions requiring c.b.a) Suppliers to conform to the RBA code c.b.b) comply with all applicable AC d) customer d.a) recruitment practices and performance including d.a.a) freely chosen employment d.a.b) no labor agents/contractor are used by the facility d.a.c) costs to workers d.a.c.a) in total absolute numbers d.a.c.b) per contract base e) The requirement to evaluate the communication program e.a) on a regular basis not exceeding 3 years e.b) sooner if there is a Significant Change.</p> <p>* Record review: 5 out of 5 communications to workers and managers covering the period May 2021 to April 2022 demonstrate consistent implementation of Participate in Communication and Negotiation Control Procedure.</p> <p>* Record review: 6 out of 6 communications with suppliers covering the period May 2021 to April 2022 demonstrate consistent implementation of Participate in Communication and Negotiation Control Procedure.</p> <p>* Record review: 4 out of 4 communications with customer covering the period May 2021 to April 2022 demonstrate consistent implementation of Participate in Communication and Negotiation Control Procedure.</p> <p>* Record review: 6 out of 6 communication effectiveness evaluation reports covering the period May 2019 to April 2022 demonstrate consistent implementation of Participate in Communication and Negotiation Control Procedure.</p> <p>* Management interview: QC Vice Manager a) details a.a) what a.b) how a.c) how frequently they communicate a.d) with workers a.e) with suppliers a.f) with customers.</p> <p>* Worker interview: 20 out of 20 workers a) confirm the last communication is conducted on March 8, 2022 b) state what is communicated to them c) confirm the communication is effective.</p> <p>* Supporting evidence reference(s): N/A</p>
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### WORKER FEEDBACK AND PARTICIPATION

Question #	VAP-E8.1
Question Text	An adequate and effective grievance/complaint process where work-related and Code-related grievances or complaints without fear of reprisal or intimidation is established can be confidentially communicated
Rating	Conformance
Conclusion	An adequate and effective confidential grievance and complaint process where work-related and Code-related grievances or complaints without fear of reprisal or intimidation is established and can be confidentially communicated.
Data points	<p>* Site observation: a) Grievance and complaint channels are clearly communicated b) Internal communication of the grievance mechanism is b.a) in workers' native language b.b) visible.</p> <p>* Record review: Employee Opinion and Grievance Control Procedure (Doc. No.: A-03-050-M0C0000, Rev.: 3, Issue date: July 23, 2021) states the detailed process a) to anonymously report grievances and complaints a.a) without fear of reprisal b) The grievance mechanism is b.a) internal for workers and staff b.b) external for workers of suppliers, local community or interested actors and Whistle blowers c) Clear grievance channels so c.a) anyone is comfortable reporting grievances c.b) reporting is encouraged. d) of investigation of d.a) any grievance d.b) complaint e) actions to be taken as a result of the investigation f) All who file a grievance or complaint shall have their identity protected g) ensure a no reprisal or intimidation approach.</p> <p>* Record review: 5 out of 5 grievance reports covering the period May 2021 to April 2022 demonstrate grievance records are available.</p> <p>* Management interview: QC Vice Manager a) states what grievance and complaint mechanisms are in place b) explains how these are b.a) monitored b.b) actioned c) details how workers can file a grievance on humane treatment d) states how a human treatment grievance is d.a) investigated d.b) acted upon e) confirms how the identity of the person who files a grievance is protected f) explains how the procedures on grievance mechanisms are externally communicated g) confirms they do not have discrimination case h) states how the cases were effectively resolved.</p> <p>* Worker interview: 20 out of 20 workers a) state what grievance and complaint mechanisms are available to them b) confirm they can use it without fear of reprisal c) state that the workplace is free of discrimination d) explain how they report any case of discrimination and they do not have such case e) state how management has responded to and remediated a reported case f) explain how they can confidentially and anonymously report ethical misconduct or concerns.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-E8.2

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Question Text	An adequate and effective process to solicit and encourage worker participation, input and feedback for improvement
Rating	Conformance
Conclusion	An adequate and effective process to solicit and encourage worker participation, input and feedback for improvement.
Data points	<ul style="list-style-type: none"> <li>* Site observation: Feedback channels are clearly communicated and visible.</li> <li>* Record review: Participate in Communication and Negotiation Control Procedure (Doc. No.: A-04-037-Q0C0000, Rev.: 10, Issue date: October 11, 2021) states the detailed process a) to obtain worker input and feedback b) promptly b.a) evaluate the validity of any input of feedback b.b) take action if the input or feedback is valid.</li> <li>* Record review: 5 out of 5 input and feedback reports covering the period May 2021 to April 2022 demonstrate grievance records are available.</li> <li>* Management interview: QC Vice Manager a) explains what mechanisms management employs to seek worker feedback b) confirms when the last feedback was received c) details what information was obtained d) states what actions were taken as a result of the feedback.</li> <li>* Worker interview: 20 out of 20 workers a) state how management seeks feedback b) confirm when the last feedback session was c) explain what action management took to respond to feedback d) state how feedback was communicated.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>

### AUDITS AND ASSESSMENTS

Question #	VAP-E9.1
Question Text	An adequate and effective Audit process to periodically assess conformance with the RBA Code pertaining to: A) Labor B) Health & Safety C) Environment and D) Ethics is in place
Rating	Conformance
Conclusion	An adequate and effective Audit process to periodically assess conformance with the RBA Code pertaining to: A) Labor and D) Ethics is in place.
Data points	<ul style="list-style-type: none"> <li>* Record review: Internal Audit Control Procedure (Doc. No.: A-04-002-Q0C0000, Rev.: 14, Issue date: May 22,2020) states the detailed process for a.a) Labor a.b) Ethics b) to periodically assess conformance with: b.a) Applicable regulatory requirements b.b) RBA Code requirements b.c) Own policies, standards and management system b.d) Other requirements to which the Auditee subscribes c) review the audit findings by senior management.</li> <li>* Record review: Conformance audit report (Doc. No: Nil, Rev.: Nil, date: February 18,2022) demonstrates the consistent implementation of Internal Audit Control Procedure.</li> <li>* Management interview: QC Vice Manager a) states which self-audit program is in place b) details what the last Audit was and its findings.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>

### CORRECTIVE ACTION PROCESS

Question #	VAP-E10.1a
Question Text	Have audits, or evaluations been performed with findings OR was there a regulatory action in the last 3 years?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-E10.1b
Question Text	Has established an adequate and effective corrective actions process to rectify and close Non-Conformances for A) Labor B) Health & Safety C) Environment and D) Ethics
Rating	Conformance
Conclusion	An adequate and effective corrective action process to rectify and close Non-conformances for A) Labor and D) Ethics is established.

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Data points	<p>* Record review: Corrective and Preventive Action Control Procedure (Doc. No.: A-04-065-Q0C0000, Rev.: 6, Issue date: June 15, 2021) states the detailed corrective actions process for a.a) Labor a.b) Ethics which contains the following: a) Corrective action plans b) corrective action tracking tables c) additional actions taken when a corrective action is off track d) a demonstrated link between the CAP and the performance management targets e) Closure of action items is e.a) confirmed by a management representative e.b) after verification by the appropriate person.</p> <p>* Record review: Conformance corrective action plan (Doc. No.: Nil, Rev.: Nil, Issue date: February 24,2022) demonstrates consistent implementation of Corrective and Preventive Action Control Procedure.</p> <p>* Record review: 2 out of 2 regulatory citations notices covering the period May 2019 to April 2022 demonstrate a) copies of any violation notices received b) are available for the past three years, including b.a) any communications with the agencies are available c) demonstrate consistent implementation of Corrective and Preventive Action Control Procedure.</p> <p>* Management interview: QC Vice Manager a) details the CAP process b) states the corrective actions that are currently being implemented c) confirms which government inspection they have received in last 3 years d) explains these did not result in d.a) a corrective action d.b) monetary penalty.</p> <p>* Supporting evidence reference(s): N/A</p>
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### DOCUMENTATION AND RECORDS

Question #	VAP-E11.1
Question Text	Adequate and effective documentation and records process with appropriate levels of access to ensure privacy for A) Labor, B) Health & Safety, C) Environment, and D) Ethics
Rating	Conformance
Conclusion	Adequate and effective documentation and records process with appropriate levels of access to ensure privacy for A) Labor and D) Ethics.
Data points	<p>* Site observation: Documents and records are securely stored with authorized access only.</p> <p>* Record review: Document and Records Control Procedure (Doc. No.: A-04-077-Q0C0000 Rev.:22, Issue date: October 15,2021) states the detailed process for a.a) Labor a.b) Ethics b) documentation and records c) with appropriate retention c.a) on site c.b) off site d) appropriate levels of access to ensure privacy e) conforming to regulatory record retention requirements.</p> <p>* Record review: Document table (Doc. No: Nil, Rev. Nil, Issue date: March 15,2022) provides an overview of documents and records in conformance with Document and Records Control Procedure.</p> <p>* Record review: 10 out of 10 company records covering the period May 2021 to April 2022 demonstrate the minimum required records a) are available b) conform Document and Records Control Procedure.</p> <p>* Management interview: QC Vice Manager a) explains their documentation and record keeping procedures a.a) including how privacy is ensured b) states how long records are maintained.</p> <p>* Supporting evidence reference(s): N/A</p>

### SUPPLIER RESPONSIBILITY

Question #	VAP-E12.1a
Question Text	Are there next tier suppliers?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-E12.1b
Question Text	The RBA Code requirements have been communicated to the next tier suppliers
Rating	Conformance
Conclusion	The RBA Code requirements have been communicated to the next tier suppliers.

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Data points	<ul style="list-style-type: none"> <li>* Record review: Supplier Social Responsibility Control Procedure (Doc. No.: A-03-062-M0C0000, Rev.: 30, Issue date: September 29, 2021) states the detailed process a) the Supplier program a.a) definition of what is major a.b) identification of Major Suppliers b) communication of b.a) the RBA code b.b) its requirements c) contractual process c.a) enforcement language on the implementation of the RBA Code for Suppliers c.a.a) on the implementation of the RBA Code regarding Labor and Ethics conditions c.a.b) Compliance with legal requirements in c.a.b.a) home country c.a.b.b) sending country c.a.c) Workers can resign without penalty c.a.d) Conform with all audit criteria regarding workers in their operations.</li> <li>* Record review: Major Supplier list (Doc. No: Nil, Rev. Nil, date: February 18, 2022) reveals a) the criteria for "Major" b) resulting Major supplier list.</li> <li>* Record review: 6 out of 6 contracts with suppliers covering the period May 2021 to April 2022 demonstrate conformance with Supplier Social Responsibility Control Procedure and Major Supplier list.</li> <li>* Record review: 6 out of 6 code implementation communication materials with suppliers covering the period May 2021 to April 2022 demonstrate conformance with Supplier Social Responsibility Control Procedure and Major Supplier list.</li> <li>* Management interview: QC Vice Manager a) states the communication mechanism to Supplier on the RBA Code a.a) the intent a.b) philosophy a.c) requirements a.d) provisions. b) no on-site service providers or indirect workers are used by the facility.</li> <li>* Worker interview: No worker of suppliers works on-site.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
Question #	VAP-E12.2a
Question Text	Are there next tier major suppliers?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-E12.2b
Question Text	Adequate and effective process to ensure that the next tier major suppliers implement the RBA Code of Conduct
Rating	Conformance
Conclusion	Adequate and effective process to ensure that the next tier major suppliers implement the RBA Code.
Data points	<ul style="list-style-type: none"> <li>* Record review: Supplier Social Responsibility Control Procedure (Doc. No.: A-03-062-M0C0000, Rev.: 30, Issue date: September 29, 2021) states the detailed RBA code implementation process for Suppliers a) includes a risk assessment process a.a) If a self-reported risk assessment is used a.a.a) information is validated a.a.b) or an Audit performed to verify risk information a.b) An audit a.b.a) VAP or CM b) a mandatory CAP process c) A commitment to not immediately de-source at a priority non-conformance discovery state but only at the non-implementation of the CAP process.</li> <li>* Record review: 6 out of 6 Supplier Verification visit reports covering the period May 2021 to April 2022 demonstrate conformance with Supplier Social Responsibility Control Procedure.</li> <li>* Record review: 6 out of 6 supplier audits reports covering the period May 2021 to April 2022 demonstrate conformance with Supplier Social Responsibility Control Procedure.</li> <li>* Record review: 6 out of 6 Supplier corrective action plans including monitoring covering the period May 2021 to April 2022 demonstrate conformance with Supplier Social Responsibility Control Procedure.</li> <li>* Management interview: QC Vice Manager a) states what evaluation method they use to assess the requirements of the code b) confirms 6 Audits were conducted in the last year for their Suppliers c) details any use of desk-audit process in lieu of a full RBA audit d) describes progress on a risk-based approach to audits and assessment.</li> <li>* Worker interview: No worker of suppliers works on-site.</li> <li>* Supporting evidence reference(s): N/A</li> </ul>
<b>MANAGEMENT SYSTEM PROVISION GOOD PRACTICES</b>	
Question #	VAP-E13.1a
Question Text	Are there Management System provisions good practices?

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Rating	No
Conclusion	
Data points	
<b>General Co. Information</b>	
<b>GENERAL AUDITEE FACILITY INFORMATION</b>	
Question #	VAP-Info1.1
Question Text	Auditee / Facility Name
Rating	Hua Jung Electronics ( Guang Dong ) Co., Ltd.
Conclusion	
Data points	
Question #	VAP-Info1.2
Question Text	Address
Rating	No. 104, Ke Ji Dong Road, Shijie Town, Dongguan City, Guangdong Province,
Conclusion	
Data points	
Question #	VAP-Info1.3
Question Text	Country
Rating	China
Conclusion	
Data points	
Question #	VAP-Info1.3a
Question Text	GPS Coordinates of Facility Main entrance
Rating	E 113°47'39" N 23°5'53"
Conclusion	
Data points	
Question #	VAP-Info1.4
Question Text	Facility Manager (Name & Title)
Rating	QC Vice General Manager
Conclusion	
Data points	
Question #	VAP-Info1.5
Question Text	Main Contact(s) for Audit (Name & Title)
Rating	QC Vice Manager
Conclusion	
Data points	

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Question #	VAP-Info1.6
Question Text	email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info1.7
Question Text	Telephone
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info1.8
Question Text	Auditee contact person who is authorized to approve and release the audit report: name
Rating	QC Vice General Manager
Conclusion	
Data points	
Question #	VAP-Info1.9
Question Text	Auditee contact person who is authorized to approve and release the audit report: email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info1.10
Question Text	Auditee contact person who is authorized to approve and release the audit report: phone
Rating	Not disclosed
Conclusion	
Data points	
<b>SITE ACTIVITIES AND PROCESSES</b>	
Question #	VAP-Info4.1
Question Text	Site Activities and Processes: Total facility surface area (square meters)
Rating	17800 square meters
Conclusion	
Data points	
<b>PRIMARY TYPES OF OPERATION</b>	
Question #	VAP-Info5.1
Question Text	Primary types of Operation: Chemical (describe)

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Rating	Glue, resin, cleaning agent, thinner, alcohol
Conclusion	
Data points	
<b>POPULATION SIZE</b>	
Question #	VAP-Info2.1
Question Text	Population Size: Number of male workers
Rating	208
Conclusion	
Data points	
Question #	VAP-Info4.2
Question Text	Site Activities and Processes: Total roofed facility surface area (square meters)
Rating	39000 square meters
Conclusion	
Data points	
Question #	VAP-Info2.2
Question Text	Population Size: Number of female workers
Rating	142
Conclusion	
Data points	
Question #	VAP-Info5.2
Question Text	Primary types of Operation: Mechanical (describe)
Rating	Winding machines, hot press machines, metal spraying machines, Lead Wire Welding machines, Laser Printing machines
Conclusion	
Data points	
Question #	VAP-Info4.3
Question Text	Site Activities and Processes: Number of production buildings (describe)
Rating	One 3-storey production building
Conclusion	
Data points	
Question #	VAP-Info2.3
Question Text	Population Size: Number of total workers
Rating	350
Conclusion	
Data points	

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# Validated Audit Report

Question #	VAP-Info5.3
Question Text	Primary types of Operation: Finishing (describe)
Rating	Assembly and packing lines (6)
Conclusion	
Data points	
<b>POPULATION CHARACTERISTICS</b>	
Question #	VAP-Info3.3
Question Text	Population Characteristics: Number of total workers under 18 years of age
Rating	0
Conclusion	
Data points	
Question #	VAP-Info5.4
Question Text	Primary types of Operation: Assembly (describe)
Rating	Assembly and packing lines (6)
Conclusion	
Data points	
Question #	VAP-Info2.3a
Question Text	Population Size: Number of male production supervisors
Rating	68
Conclusion	
Data points	
Question #	VAP-Info5.5
Question Text	Primary types of Operation: Other (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info2.3b
Question Text	Population Size: Number of female production supervisors
Rating	48
Conclusion	
Data points	
Question #	VAP-Info4.5
Question Text	Site Activities and Processes: Component manufacturing(describe)
Rating	Film Capacitors Process: Winding - Hot Press - Metal Spraying - Lead Wire Welding – Epoxy Encapsulation – Laser Printing – Testing - Packaging

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Conclusion	
Data points	
Question #	VAP-Info3.6
Question Text	Population Characteristics: Number of total student workers/apprentices/interns:
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.6
Question Text	Site Activities and Processes: Final Assembly (describe)
Rating	Assembly and packing lines (6)
Conclusion	
Data points	
Question #	VAP-Info4.7
Question Text	Site Activities and Processes: Metal Stamping / plating (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.8
Question Text	Site Activities and Processes: PC Board manufacturing (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.9
Question Text	Population Characteristics: Number of total temporary workers
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.9
Question Text	Site Activities and Processes: Painting/coating (describe)
Rating	Epoxy Powder Coating
Conclusion	
Data points	
Question #	VAP-Info3.10
Question Text	Population Characteristics: Number of male migrant workers

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Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.10
Question Text	Site Activities and Processes; Distribution/Logistics (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.11
Question Text	Population Characteristics: Number of female migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.11
Question Text	Site Activities and Processes: Clean room (describe)
Rating	One clean room for winding operation with area of 600 Square meters (one hundred thousand class)
Conclusion	
Data points	
Question #	VAP-Info4.12
Question Text	Site Activities and Processes: Logistics & Distribution (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.12
Question Text	Population Characteristics: Number of total migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.13
Question Text	Site Activities and Processes: Business Services - Office Equipment (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.14

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Question Text	Site Activities and Processes: Business Services - Branded Products (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.15
Question Text	Site Activities and Processes: Business Services - Finance Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.15
Question Text	Population Characteristics: Number of total indirect labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.16
Question Text	Site Activities and Processes: Business Services - HR Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.16
Question Text	Population Characteristics: Nationalities of migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.17
Question Text	Site Activities and Processes: Legal Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info3.17
Question Text	Population Characteristics: Language(s) spoken by workers
Rating	Mandarin
Conclusion	
Data points	

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# Validated Audit Report

Question #	VAP-Info3.18
Question Text	Population Characteristics: Language(s) spoken by management
Rating	Mandarin
Conclusion	
Data points	
Question #	VAP-Info4.18
Question Text	Site Activities and Processes: Fleet Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.19
Question Text	Site Activities and Processes: Real Estate Construction (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.20
Question Text	Site Activities and Processes: Real Estate Maintenance (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.21
Question Text	Site Activities and Processes: Business Services - Real Estate Security (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.22
Question Text	Site Activities and Processes: Business Services - Facility Management (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.23
Question Text	Site Activities and Processes: Business Services - Rent/Lease (describe)
Rating	NA
Conclusion	
Data points	

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# Validated Audit Report

Question #	VAP-Info4.24
Question Text	Site Activities and Processes: Hardware - Product Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.25
Question Text	Site Activities and Processes: Hardware - Maintenance Related (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.26
Question Text	Site Activities and Processes: Hardware - Reseller/Distributor (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.27
Question Text	Site Activities and Processes: Sales/Marketing Services (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.28
Question Text	Site Activities and Processes: Printing Services (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.29
Question Text	Site Activities and Processes: Printing Materials & Supplies (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.30
Question Text	Site Activities and Processes: Professional Services - Consultant (describe)
Rating	NA
Conclusion	

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## Validated Audit Report

Data points	
Question #	VAP-Info4.31
Question Text	Site Activities and Processes: Professional Services - Contact Center (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.32
Question Text	Site Activities and Processes: Professional Services - Sales & Support (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.33
Question Text	Site Activities and Processes: Technology Outsourced Services (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.34
Question Text	Site Activities and Processes: Contract Outside Labor (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.35
Question Text	Site Activities and Processes: Software - Product/License (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.36
Question Text	Site Activities and Processes: Software - Maintenance & Support (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.37
Question Text	Site Activities and Processes: Software - Application Service Provider (describe)
Rating	NA

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Conclusion	
Data points	
Question #	VAP-Info4.38
Question Text	Site Activities and Processes: Telecom - Maintenance and Managed Services (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.39
Question Text	Site Activities and Processes: Telecom - Mobility (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.40
Question Text	Site Activities and Processes: Telecom - Voice and Data Transport (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.41
Question Text	Site Activities and Processes: Travel Related Services (describe)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info4.42
Question Text	Site Activities and Processes: Services / Other (describe)
Rating	NA
Conclusion	
Data points	
<b>ON-SITE SERVICES</b>	
Question #	VAP-Info6.1
Question Text	On-Site Services: Fire brigade/warden team (description)
Rating	8 volunteer firemen as a fire team
Conclusion	
Data points	
Question #	VAP-Info6.2

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Question Text	On-Site Services: Hospital/infirmary (description)
Rating	No hospital/infirmary is available, 6 trained first aiders are trained.
Conclusion	
Data points	
Question #	VAP-Info6.3
Question Text	On-Site Services: Chemical Spill Response Team (description)
Rating	One Chemical Spill Response Team with 6 team members.
Conclusion	
Data points	
Question #	VAP-Info6.4
Question Text	On-Site Services: Wastewater treatment type (description)
Rating	There is no industrial wastewater treatment facility in the facility. The industrial waste water will be collected and treated as hazardous waste. The sanitary sewage is discharged to municipal pipe network after treatment. All wastewater discharge streams are within wastewater discharge standard.
Conclusion	
Data points	
Question #	VAP-Info6.5
Question Text	On-Site Services: Power Generation (description)
Rating	There are 3 power generations with capacity one 640kw, one 720kw and one 1100kw respectively.
Conclusion	
Data points	
Question #	VAP-Info6.6
Question Text	On-Site Services: Dormitory (# people + description)
Rating	Two 6-story dormitory buildings with 56 male employees and 30 female employees live in.
Conclusion	
Data points	
Question #	VAP-Info6.7
Question Text	On-Site Services: Canteen (description)
Rating	One canteen located at the ground floor of one 6-storey dormitory building with area of 576 square meters with 300 sites and 6 kitchen workers.
Conclusion	
Data points	
Question #	VAP-Info6.8
Question Text	On-Site Services: Kitchen (description)
Rating	One kitchen located at the ground floor of one 6-storey dormitory building with 6 kitchen workers.
Conclusion	

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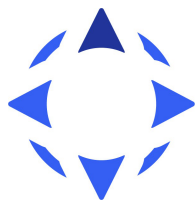
## Validated Audit Report

Data points	
Question #	VAP-Info6.9
Question Text	On-Site Services: Recycling (description)
Rating	Living waste, metal waste
Conclusion	
Data points	
Question #	VAP-Info6.10
Question Text	On-Site Services: Other (description)
Rating	NA
Conclusion	
Data points	
<b>CERTIFICATIONS</b>	
Question #	VAP-Info7.0
Question Text	Please list all current certifications relating to labor, ethics, environment, and health & safety. Include Name and date valid until. Separate each with a hard enter.
Rating	Health & Safety: Occupational Health And Safety Management System ISO45001:2018 certificate (certificate number: 04120S30144R3M, Issue date: December 3, 2020, Expiry date: December 21, 2023, issued by: CTI)  Environment: Environmental Management System ISO14001:2015 certificate (certificate number: 04120E30150R4M, Issue date: April 14,2021, Expiry date: April 13,2024, issued by: CTI)
Conclusion	
Data points	
<b>CONSULTING SERVICES USED IN LAST YEAR</b>	
Question #	VAP-Info12.0
Question Text	For purposes of identifying any conflicts of interest, please state if you have used the audit firm company for consulting purposes over the last 1 year and / or since the last full RBA-based audit.
Rating	NA
Conclusion	
Data points	
<b>LABOR AGENT/CONTRACTOR SERVICES USED IN LAST 2 YEARS</b>	
Question #	VAP-Info16.0
Question Text	Please list the names of any recruiting / labor agents or brokers in the past 2 years or since the last full audit
Rating	NA
Conclusion	
Data points	
<b>OTHER CONSULTING SERVICES USED IN LAST 3 YEARS</b>	

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Question #	VAP-Info17.0
Question Text	Used Other consulting services in the last 3 years
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info17.1
Question Text	Other consulting services used in last 3 years: Consulting description of work
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info17.2
Question Text	Other consulting services used in last 3 years: Consulting firm (name and address)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info17.3
Question Text	Other consulting services used in last 3 years: Consulting started on (date - dd/mm/yyyy)
Rating	NA
Conclusion	
Data points	
Question #	VAP-Info17.4
Question Text	Other consulting services used in last 3 years: Consulting ended on (date - dd/mm/yyyy)
Rating	NA
Conclusion	
Data points	
<b>AUDIT TEAM: LEAD AUDITOR</b>	
Question #	VAP-Info18.1
Question Text	Lead Auditor Name
Rating	Auditor ID- 642
Conclusion	
Data points	
Question #	VAP-Info18.2
Question Text	Lead Auditor Email
Rating	Not disclosed
Conclusion	

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# Validated Audit Report

Data points	
Question #	VAP-Info18.3
Question Text	Lead Auditor Phone
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info18.4
Question Text	Lead Auditor APSCA Registration Number ( RA 217xxxxx or ASCA 217xxxxxx )
Rating	CSCA 21702080
Conclusion	
Data points	
Question #	VAP-Info18.5
Question Text	Auditor APSCA Registration Number ( RA 217xxxxx or ASCA 217xxxxxx )
Rating	CSCA 21702574
Conclusion	
Data points	
Question #	VAP-Info18.6
Question Text	Audit Firm APSCA Registration Number
Rating	11600006
Conclusion	
Data points	
<b>LABOR AUDITOR</b>	
Question #	VAP-Info19.1
Question Text	Labor Auditor Name
Rating	Auditor ID- 642
Conclusion	
Data points	
Question #	VAP-Info19.2
Question Text	Labor Auditor Email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info19.3
Question Text	Labor Auditor Phone

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# Validated Audit Report

Rating	Not disclosed
Conclusion	
Data points	
<b>ETHICS AUDITOR</b>	
Question #	VAP-Info20.1
Question Text	Ethics Auditor Name
Rating	Auditor ID- 642
Conclusion	
Data points	
Question #	VAP-Info20.2
Question Text	Ethics Auditor Email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info20.3
Question Text	Ethics Auditor Phone
Rating	Not disclosed
Conclusion	
Data points	
<b>HEALTH AND SAFETY AUDITOR</b>	
Question #	VAP-Info21.1
Question Text	Health and Safety Auditor Name
Rating	Auditor ID- 633
Conclusion	
Data points	
Question #	VAP-Info21.2
Question Text	Health and Safety Auditor Email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info21.3
Question Text	Health and Safety Auditor Phone
Rating	Not disclosed
Conclusion	
Data points	

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ENVIRONMENT AUDITOR	
Question #	VAP-Info22.1
Question Text	Environment Auditor Name
Rating	Auditor ID- 633
Conclusion	
Data points	
Question #	VAP-Info22.2
Question Text	Environment Auditor Email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info22.3
Question Text	Environment Auditor Phone
Rating	Not disclosed
Conclusion	
Data points	
MANAGEMENT SYSTEMS AUDITOR	
Question #	VAP-Info23.1
Question Text	Management Systems Auditor Name
Rating	Auditor ID- 642
Conclusion	
Data points	
Question #	VAP-Info23.2
Question Text	Management Systems Auditor Email
Rating	Not disclosed
Conclusion	
Data points	
Question #	VAP-Info23.3
Question Text	Management Systems Auditor Phone
Rating	Not disclosed
Conclusion	
Data points	
STAFF INTERVIEWS	
Question #	VAP-Info24.1

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# Validated Audit Report

Question Text	Total number of interviews
Rating	20
Conclusion	
Data points	
Question #	VAP-Info24.2
Question Text	Total number of interviews (male)
Rating	14
Conclusion	
Data points	
Question #	VAP-Info24.3
Question Text	Total number of interviews (female)
Rating	6
Conclusion	
Data points	
Question #	VAP-Info24.4
Question Text	Total number of interviews (direct workers)
Rating	20
Conclusion	
Data points	
Question #	VAP-Info24.5
Question Text	Total number of interviews (indirect workers)
Rating	0
Conclusion	
Data points	
Question #	VAP-Info24.6
Question Text	Total number of interviews (shift workers)
Rating	13
Conclusion	
Data points	
Question #	VAP-Info24.7
Question Text	Total number of interviews (foreign migrant workers)
Rating	0
Conclusion	
Data points	

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## Validated Audit Report

Question #	VAP-Info24.8
Question Text	Total number of group interviews
Rating	10
Conclusion	
Data points	
Question #	VAP-Info24.9
Question Text	Total number of individual interviews
Rating	10
Conclusion	
Data points	
<b>TOTAL INTERVIEWS</b>	
Question #	VAP-Info28.9
Question Text	Total interviews: Percentage of workforce (total)
Rating	5.71%
Conclusion	
Data points	
<b>MINIMUM NUMBER OF INTERVIEWS TO BE CARRIED OUT IN THIS AUDIT</b>	
Question #	VAP-Info29.1
Question Text	Minimum number of interviews to be carried out in this audit
Rating	20
Conclusion	
Data points	
<b>PROCESS AND SUMMARY</b>	
Question #	VAP-Info30.1
Question Text	Process and summary: Management attitude
Rating	Management is cooperative and provided sufficient resources to facilitate the audit. Supporting persons are arranged by the management to support auditors, including documentation review, site tour, workers interview, and reporting. Meeting room and workspace for audit team is arranged appropriately, power supply is arranged. QC Vice General Manager and his team are cooperative. The QC Vice Manager answers questions that relate to the standard and other parts supported by her team. Management let auditors to have direct access to the workers for interview.
Conclusion	
Data points	
Question #	VAP-Info30.2
Question Text	Process and summary: Worker attitude
Rating	The facility management agrees that auditors conduct group and individual interviews with workers confidentially. Workers are chosen within the audit scope freely without any influence by the facility management. Auditors randomly select 20 workers from different production workshops, gender, age and positions for formal interview in a meeting room without being interrupted. All workers are open and cooperative during the interview, and all of them are satisfied with the benefits and work conditions of the facility.

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## Validated Audit Report

Conclusion	
Data points	
Question #	VAP-Info30.3
Question Text	Process and summary: Process Integrity
Rating	The last month's wages of April 2022 have not been paid which was in line with the local legal law.
Conclusion	
Data points	
Question #	VAP-Info30.4
Question Text	Process and summary: Closing meeting
Rating	The close meeting is held at 13:30 pm on May 6, 2022, QC Vice General Manager, QC Vice Manager, Management Department Manager, Facility Director and Management Department Engineer attend the meeting. The audit result has been reviewed and agreed by the management during the closing meeting. All findings are communicated to management and facility representatives in audit process and communicated again in closing meeting. The facility representatives fully agree the audit findings without any comment.
Conclusion	
Data points	
Question #	VAP-Info30.5
Question Text	Process and summary: Exception management
Rating	The last month's wages of April 2022 have not been paid which was in line with the local legal law.
Conclusion	
Data points	
Question #	VAP-Info30.6
Question Text	Process and summary: Legal Nonconformance Risks

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Rating	<p>Total 14 non-compliances for legal findings are identified and showed as below:</p> <p>Labor: A3.1: Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 41 /中华人民共和国劳动法 (2018修正) 第四十一条 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, 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 laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours. / 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。]</p> <p>A3.2: Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 38 /中华人民共和国劳动法 (2018修正) 第三十八条 The employing unit shall guarantee that its staff and workers have at least one day off in a week. / 用人单位应当保证劳动者每周至少休息一日。]</p> <p>A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. [Regulations on Paid Annual Leave for Employees (2007), Article 3 / 职工带薪年休假条例 (2007) 第三条 Where an employee has served one full year but less than 10 years accumulatively, he is entitled to five days of annual leave. If he has served 10 full years but less than 20 years, annual leave is 10 days. If he has served for 20 full years, annual leave is 15 days. / 职工累计工作已满1年不满10年的, 年休假5天; 已满10年不满20年的, 年休假10天; 已满20年的, 年休假15天。]</p> <p>A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). [Regulation on the Payment of Wages in Guangdong Province (2016 Amendment), Article 13 /广东省工资支付条例 (2016修正) 第十三条 If the labor relationship between the employer and the laborer is discharged or terminated in accordance with the law, wages shall be paid to laborers in full at once on the date when the labor relation is terminated or discharged. / 用人单位与劳动者依法终止或者解除劳动合同关系的, 应当在终止或者解除劳动合同关系当日结清并一次性支付劳动者工资。]</p> <p>A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. [Regulation on the Administration of Housing Provident Fund (revised in 2002)/住房公积金管理条例(2002修订) Housing Provident Fund regulations apply to the workers in all geographic regions of the country, whether they are migrant workers registered elsewhere or residential workers registered in the city where they are working. Article 15 Units shall register employee's information in housing provident fund management center since employee joins the units, set housing provident fund account for employee in the entrusted bank with the approved documents from housing provident fund center. Article 16 Contributions both for employee and unit must be calculated based on each worker's average monthly wage over the last year. Article 18 Different regions may establish variable housing provident fund rates, as decided by local governments, but contributions may not fall below a minimum of five percent (5%) of the monthly wage. / 第十五条单位录用职工的, 应当自录用之日起30日内到住房公积金管理中心办理缴存登记, 并持住房公积金管理中心的审核文件, 到受委托银行办理职工住房公积金账户的设立或者</p>
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转移手续。第十六条职工住房公积金的月缴存额为职工本人上一年度月平均工资乘以职工住房公积金缴存比例。单位为职工缴存的住房公积金的月缴存额为职工本人上一年度月平均工资乘以单位住房公积金缴存比例。第十八条职工和单位住房公积金的缴存比例均不得低于职工上一年度月平均工资的5%；有条件的城市，可以适当提高缴存比例。具体缴存比例由住房公积金管理委员会拟订，经本级人民政府审核后，报省、自治区、直辖市人民政府批准]

Health and Safety:

B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.[Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 24/危险化学品安全管理条例 (2013修订) 第二十四条. Hazardous chemicals shall be stored at designated warehouses, sites or store rooms and managed by designated persons./ 危险化学品应当储存在专用仓库、专用场地或者专用储存室内，并由专人负责管理；]

B1.3 Personal Protective Equipment (PPE) are required to control health & safety hazards and worker exposure.

Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&B(Axial&Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.[Production Safety Law of the People's Republic of China (2014 Amendment), Article 42/中华人民共和国安全生产法 (2014修正) 第四十二条 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules./ 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。]

B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters.

[Fire Prevention Law of the People's Republic of China (2019 Amendment), Article 16/中华人民共和国消防法 (2019修正) 第十六条 Organs, social groups, enterprises, public institutions and other entities shall perform the following fire safety duties: 4. to ensure that the evacuation passages, safety exits and fire truck passages are clear and the fire and smoke compartmentation and fire separation distance meet the relevant fire protection technical standards;机关、团体、企业、事业等单位应当履行下列消防安全职责：(四)保障疏散通道、安全出口、消防车通道畅通，保证防火防烟分区、防火间距符合消防技术标准；]

B3.1 Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards. [Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35/中华人民共和国职业病防治法 (2018修正) 第三十五条 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results./ 对从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。]

B4.1 Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors.

[Provisions on the Supervision and Administration of Occupational Health at Work Sites (2012), Article 20/工作场所职业卫生监督管理规定 (2012) 第二十条 The employer with serious occupational disease hazards shall entrust the accredited occupational health technical service institutions to conduct present situation assessment of occupational disease hazards once every three years at least besides meet the previous article./ 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。]

B6.2 A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A.

[General Rules of Design on Health and Safety of Production Facility (GB 5083-1999), article 6.1.2/生产设备安全卫生设计总则 (GB 5083-1999) 第6.1.2条 Necessary safeguard shall be installed for all moving parts that are accessible to the operator during machine operation./ 对操作人员在设备运行时可能触及的可动零部件，必须配置必要的安全防护装置。]

B7.1 Required health & safety licenses, permits, registrations and certificates related to food, sanitation and housing



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	<p>are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings. [Provisions on the Supervision and Administration of Fire Protection of Construction Projects (2012 Revision), Article 13/建设工程消防监督管理规定 (2012修订) 第十三条 For a people-intensive premise under one of the following circumstances, the construction unit thereof shall apply to the fire protection division of the public security organ for the fire protection design review, and shall apply for a fire protection as-built acceptance to the fire protection division of the public security organ which has issued the fire protection design review opinions after the completion of the construction project.(5) It is...the staff collective dormitory of a labor-intensive enterprise with the total construction area of more than 1,000 square meters./ 对具有下列情形之一的人员密集场所, 建设单位应当向公安机关消防机构申请消防设计审核, 并在建设工程竣工后向出具消防设计审核意见的公安机关消防机构申请消防验收: (五) 建筑总面积大于一千平方米的.....劳动密集型企业的员工集体宿舍;</p> <p>Administrative Measures for Protecting against and Mitigating Thunder and Lightning Disasters (2013 Amendment), Article 19/防雷减灾管理办法 (2013修改) 第十九条.After being put into use, a regular inspection system shall be established for the thunder protection devices. Thunder protection devices shall be tested once a year./ 投入使用后的防雷装置实行定期检测制度。防雷装置应当每年检测一次。]</p> <p>B7.2 Dormitories are clean, safe and well maintained and most facilities meet international housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings. [Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment)10.3.5/建筑设计防火规范 (GB 50016-2014, 2018修正) 第10.3.5条 Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements:1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place./ 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; ]</p> <p>Environmental: C3.1 Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment), Article 3.6.12/建筑设计防火规范 (GB 50016-2014, 2018修正) 3.6.12 Facilities capable of preventing liquids from flooding and spreading shall be provided in storage storing Class A, B and C liquids. Stores of items that are subject to fire and explosion in case of damp shall be protected against water immersion./ 甲、乙、丙类液体仓库应设置防止液体流散的设施。遇湿会发生燃烧爆炸的物品仓库应采取防止水浸渍的措施。</p> <p>Standard on Pollution Control of Hazardous Waste Storage (GB 18597-2001 / XG 1-2013), Article 6.3.9/危险废物贮存污染控制标准 (GB 18597-2001 / XG 1-2013) 6.3.9 Hazardous waste storage shall be wind-proof, rain-proof and sun-proof./ 危险废物堆要防风、防雨、防晒。]</p>
Conclusion	
Data points	
Question #	VAP-Info30.7
Question Text	Process and summary: Executive summary



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Rating	<p>The Validated initial audit of HUA JUNG ELECTRONICS (GUANG DONG) CO., LTD. is evaluated the facility's labor, ethics, occupational health &amp; safety, environmental practices, and supporting management systems against the requirements of the RBA Code 7.0.1, relevant local rules and regulations, national legislation. The audit is performed during May 5, 2022 to May 6, 2022. The duration is 3-person days for 2 auditors. No integrity issues are encountered during the audit. The Workforce Composition Survey was not received according to management interview. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. There are 1 priority non-compliance and 14 major non-compliances identified by the audit team.</p> <p>Summary of Priority Finding: Health and Safety: B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&amp;B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters.</p> <p>Summary of Major Findings: Labor: A3.1: Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function.</p> <p>A3.2: Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function.</p> <p>A3.3: The Policy and procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours. However, the working hours controls are found to be in non-conformance of workers' overtime hours and weekly working hours, one day off per 7 are not in line with legal and RBA requirements. The highest weekly working hours are 62 hours/ workweek, the highest overtime hours are 4 hours/ day and 104 hours/ month, the longest consecutive working days are 12 days worked.</p> <p>A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length.</p> <p>A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month).</p> <p>A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers.</p> <p>Health and Safety: B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed</p>
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	<p>and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>B1.3 Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.</p> <p>B3.1 Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards.</p> <p>B4.1 Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors.</p> <p>B6.2 A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A.</p> <p>B7.1 Required health &amp; safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings.</p> <p>B7.2 Dormitories are clean, safe and well maintained and most facilities meet international housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>Environmental:</p> <p>C3.1 Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p>
Conclusion	
Data points	

### Info Section Details

GENERAL AUDITEE FACILITY INFORMATION		
Question #	Question Text	Answer
VAP-Info1.1	Auditee / Facility Name	Hua Jung Electronics ( Guang Dong ) Co., Ltd.
VAP-Info1.2	Address	No. 104, Ke Ji Dong Road, Shijie Town, Dongguan City, Guangdong Province,
VAP-Info1.3	Country	China
VAP-Info1.3a	GPS Coordinates of Facility Main entrance	E 113°47'39" N 23°5'53"
VAP-Info1.4	Facility Manager (Name & Title)	QC Vice General Manager
VAP-Info1.5	Main Contact(s) for Audit (Name & Title)	QC Vice Manager
VAP-Info1.6	email	Not disclosed
VAP-Info1.7	Telephone	Not disclosed
VAP-Info1.8	Auditee contact person who is authorized to approve and release the audit report: name	QC Vice General Manager
VAP-Info1.9	Auditee contact person who is authorized to approve and release the audit report: email	Not disclosed
VAP-Info1.10	Auditee contact person who is authorized to approve and release the audit report: phone	Not disclosed

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PRIMARY TYPES OF OPERATION		
Question #	Question Text	Answer
VAP-Info5.1	Primary types of Operation: Chemical (describe)	Glue, resin, cleaning agent, thinner, alcohol
SITE ACTIVITIES AND PROCESSES		
Question #	Question Text	Answer
VAP-Info4.1	Site Activities and Processes: Total facility surface area (square meters)	17800 square meters
POPULATION SIZE		
Question #	Question Text	Answer
VAP-Info2.1	Population Size: Number of male workers	208
VAP-Info5.2	Primary types of Operation: Mechanical (describe)	Winding machines, hot press machines, metal spraying machines, Lead Wire Welding machines, Laser Printing machines
VAP-Info4.2	Site Activities and Processes: Total roofed facility surface area (square meters)	39000 square meters
VAP-Info2.2	Population Size: Number of female workers	142
POPULATION CHARACTERISTICS		
Question #	Question Text	Answer
VAP-Info3.3	Population Characteristics: Number of total workers under 18 years of age	0
VAP-Info4.3	Site Activities and Processes: Number of production buildings (describe)	One 3-storey production building
VAP-Info2.3	Population Size: Number of total workers	350
VAP-Info5.3	Primary types of Operation: Finishing (describe)	Assembly and packing lines (6)
VAP-Info5.4	Primary types of Operation: Assembly (describe)	Assembly and packing lines (6)
VAP-Info2.3a	Population Size: Number of male production supervisors	68
VAP-Info2.3b	Population Size: Number of female production supervisors	48
VAP-Info4.5	Site Activities and Processes: Component manufacturing(describe)	Film Capacitors Process: Winding - Hot Press - Metal Spraying - Lead Wire Welding – Epoxy Encapsulation – Laser Printing – Testing - Packaging
VAP-Info5.5	Primary types of Operation: Other (describe)	NA
VAP-Info3.6	Population Characteristics: Number of total student workers/apprentices/interns:	0
VAP-Info4.6	Site Activities and Processes: Final Assembly (describe)	Assembly and packing lines (6)
VAP-Info4.7	Site Activities and Processes: Metal Stamping / plating (describe)	NA
VAP-Info4.8	Site Activities and Processes: PC Board manufacturing (describe)	NA
VAP-Info3.9	Population Characteristics: Number of total temporary workers	0
VAP-Info4.9	Site Activities and Processes: Painting/coating (describe)	Epoxy Powder Coating
VAP-Info4.10	Site Activities and Processes; Distribution/Logistics (describe)	NA
VAP-Info3.10	Population Characteristics: Number of male migrant workers	0
VAP-Info4.11	Site Activities and Processes: Clean room (describe)	One clean room for winding operation with area of 600 Square meters (one hundred thousand class)
VAP-Info3.11	Population Characteristics: Number of female migrant labor	0
VAP-Info3.12	Population Characteristics: Number of total migrant labor	0
VAP-Info4.12	Site Activities and Processes: Logistics & Distribution (describe)	NA
VAP-Info4.13	Site Activities and Processes: Business Services - Office Equipment (describe)	NA
VAP-Info4.14	Site Activities and Processes: Business Services - Branded Products (describe)	NA

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VAP-Info4.15	Site Activities and Processes: Business Services - Finance Related (describe)	NA
VAP-Info3.15	Population Characteristics: Number of total indirect labor	0
VAP-Info4.16	Site Activities and Processes: Business Services - HR Related (describe)	NA
VAP-Info3.16	Population Characteristics: Nationalities of migrant labor	0
VAP-Info4.17	Site Activities and Processes: Legal Related (describe)	NA
VAP-Info3.17	Population Characteristics: Language(s) spoken by workers	Mandarin
VAP-Info4.18	Site Activities and Processes: Fleet Related (describe)	NA
VAP-Info3.18	Population Characteristics: Language(s) spoken by management	Mandarin
VAP-Info4.19	Site Activities and Processes: Real Estate Construction (describe)	NA
VAP-Info4.20	Site Activities and Processes: Real Estate Maintenance (describe)	NA
VAP-Info4.21	Site Activities and Processes: Business Services - Real Estate Security (describe)	NA
VAP-Info4.22	Site Activities and Processes: Business Services - Facility Management (describe)	NA
VAP-Info4.23	Site Activities and Processes: Business Services - Rent/Lease (describe)	NA
VAP-Info4.24	Site Activities and Processes: Hardware - Product Related (describe)	NA
VAP-Info4.25	Site Activities and Processes: Hardware - Maintenance Related (describe)	NA
VAP-Info4.26	Site Activities and Processes: Hardware - Reseller/Distributor (describe)	NA
VAP-Info4.27	Site Activities and Processes: Sales/Marketing Services (describe)	NA
VAP-Info4.28	Site Activities and Processes: Printing Services (describe)	NA
VAP-Info4.29	Site Activities and Processes: Printing Materials & Supplies (describe)	NA
VAP-Info4.30	Site Activities and Processes: Professional Services - Consultant (describe)	NA
VAP-Info4.31	Site Activities and Processes: Professional Services - Contact Center (describe)	NA
VAP-Info4.32	Site Activities and Processes: Professional Services - Sales & Support (describe)	NA
VAP-Info4.33	Site Activities and Processes: Technology Outsourced Services (describe)	NA
VAP-Info4.34	Site Activities and Processes: Contract Outside Labor (describe)	NA
VAP-Info4.35	Site Activities and Processes: Software - Product/License (describe)	NA
VAP-Info4.36	Site Activities and Processes: Software - Maintenance & Support (describe)	NA
VAP-Info4.37	Site Activities and Processes: Software - Application Service Provider (describe)	NA
VAP-Info4.38	Site Activities and Processes: Telecom - Maintenance and Managed Services (describe)	NA
VAP-Info4.39	Site Activities and Processes: Telecom - Mobility (describe)	NA
VAP-Info4.40	Site Activities and Processes: Telecom - Voice and Data Transport (describe)	NA
VAP-Info4.41	Site Activities and Processes: Travel Related Services (describe)	NA
VAP-Info4.42	Site Activities and Processes: Services / Other (describe)	NA
<b>ON-SITE SERVICES</b>		
Question #	Question Text	Answer
VAP-Info6.1	On-Site Services: Fire brigade/warden team (description)	8 volunteer firemen as a fire team
VAP-Info6.2	On-Site Services: Hospital/infirmary (description)	No hospital/infirmary is available, 6 trained first aiders are trained.
VAP-Info6.3	On-Site Services: Chemical Spill Response Team (description)	One Chemical Spill Response Team with 6 team members.

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VAP-Info6.4	On-Site Services: Wastewater treatment type (description)	There is no industrial wastewater treatment facility in the facility. The industrial waste water will be collected and treated as hazardous waste. The sanitary sewage is discharged to municipal pipe network after treatment. All wastewater discharge streams are within wastewater discharge standard.
VAP-Info6.5	On-Site Services: Power Generation (description)	There are 3 power generations with capacity one 640kw, one 720kw and one 1100kw respectively.
VAP-Info6.6	On-Site Services: Dormitory (# people + description)	Two 6-story dormitory buildings with 56 male employees and 30 female employees live in.
VAP-Info6.7	On-Site Services: Canteen (description)	One canteen located at the ground floor of one 6-storey dormitory building with area of 576 square meters with 300 sites and 6 kitchen workers.
VAP-Info6.8	On-Site Services: Kitchen (description)	One kitchen located at the ground floor of one 6-storey dormitory building with 6 kitchen workers.
VAP-Info6.9	On-Site Services: Recycling (description)	Living waste, metal waste
VAP-Info6.10	On-Site Services: Other (description)	NA

### CERTIFICATIONS

Question #	Question Text	Answer
VAP-Info7.0	Please list all current certifications relating to labor, ethics, environment, and health & safety. Include Name and date valid until. Separate each with a hard enter.	Health & Safety: Occupational Health And Safety Management System ISO45001:2018 certificate (certificate number: 04120S30144R3M, Issue date: December 3, 2020, Expiry date: December 21, 2023, issued by: CTI)  Environment: Environmental Management System ISO14001:2015 certificate (certificate number: 04120E30150R4M, Issue date: April 14,2021, Expiry date: April 13,2024, issued by: CTI)

### CONSULTING SERVICES USED IN LAST YEAR

Question #	Question Text	Answer
VAP-Info12.0	For purposes of identifying any conflicts of interest, please state if you have used the audit firm company for consulting purposes over the last 1 year and / or since the last full RBA-based audit.	NA

### LABOR AGENT/CONTRACTOR SERVICES USED IN LAST 2 YEARS

Question #	Question Text	Answer
VAP-Info16.0	Please list the names of any recruiting / labor agents or brokers in the past 2 years or since the last full audit	NA

### OTHER CONSULTING SERVICES USED IN LAST 3 YEARS

Question #	Question Text	Answer
VAP-Info17.0	Used Other consulting services in the last 3 years	NA
VAP-Info17.1	Other consulting services used in last 3 years: Consulting description of work	NA
VAP-Info17.2	Other consulting services used in last 3 years: Consulting firm (name and address)	NA
VAP-Info17.3	Other consulting services used in last 3 years: Consulting started on (date - dd/mm/yyyy)	NA

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VAP-Info17.4	Other consulting services used in last 3 years: Consulting ended on (date - dd/mm/yyyy)	NA
<b>AUDIT TEAM: LEAD AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info18.1	Lead Auditor Name	Auditor ID- 642
VAP-Info18.2	Lead Auditor Email	Not disclosed
VAP-Info18.3	Lead Auditor Phone	Not disclosed
VAP-Info18.4	Lead Auditor APSCA Registration Number ( RA 217xxxx or ASCA 217xxxxxx )	CSCA 21702080
VAP-Info18.5	Auditor APSCA Registration Number ( RA 217xxxx or ASCA 217xxxxxx )	CSCA 21702574
VAP-Info18.6	Audit Firm APSCA Registration Number	11600006
<b>LABOR AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info19.1	Labor Auditor Name	Auditor ID- 642
VAP-Info19.2	Labor Auditor Email	Not disclosed
VAP-Info19.3	Labor Auditor Phone	Not disclosed
<b>ETHICS AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info20.1	Ethics Auditor Name	Auditor ID- 642
VAP-Info20.2	Ethics Auditor Email	Not disclosed
VAP-Info20.3	Ethics Auditor Phone	Not disclosed
<b>HEALTH AND SAFETY AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info21.1	Health and Safety Auditor Name	Auditor ID- 633
VAP-Info21.2	Health and Safety Auditor Email	Not disclosed
VAP-Info21.3	Health and Safety Auditor Phone	Not disclosed
<b>ENVIRONMENT AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info22.1	Environment Auditor Name	Auditor ID- 633
VAP-Info22.2	Environment Auditor Email	Not disclosed
VAP-Info22.3	Environment Auditor Phone	Not disclosed
<b>MANAGEMENT SYSTEMS AUDITOR</b>		
Question #	Question Text	Answer
VAP-Info23.1	Management Systems Auditor Name	Auditor ID- 642
VAP-Info23.2	Management Systems Auditor Email	Not disclosed
VAP-Info23.3	Management Systems Auditor Phone	Not disclosed
<b>STAFF INTERVIEWS</b>		
Question #	Question Text	Answer
VAP-Info24.1	Total number of interviews	20
VAP-Info24.2	Total number of interviews (male)	14
VAP-Info24.3	Total number of interviews (female)	6
VAP-Info24.4	Total number of interviews (direct workers)	20
VAP-Info24.5	Total number of interviews (indirect workers)	0

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VAP-Info24.6	Total number of interviews (shift workers)	13
VAP-Info24.7	Total number of interviews (foreign migrant workers)	0
VAP-Info24.8	Total number of group interviews	10
VAP-Info24.9	Total number of individual interviews	10
<b>TOTAL INTERVIEWS</b>		
Question #	Question Text	Answer
VAP-Info28.9	Total interviews: Percentage of workforce (total)	5.71%
<b>MINIMUM NUMBER OF INTERVIEWS TO BE CARRIED OUT IN THIS AUDIT</b>		
Question #	Question Text	Answer
VAP-Info29.1	Minimum number of interviews to be carried out in this audit	20
<b>PROCESS AND SUMMARY</b>		
Question #	Question Text	Answer
VAP-Info30.1	Process and summary: Management attitude	Management is cooperative and provided sufficient resources to facilitate the audit. Supporting persons are arranged by the management to support auditors, including documentation review, site tour, workers interview, and reporting. Meeting room and workspace for audit team is arranged appropriately, power supply is arranged. QC Vice General Manager and his team are cooperative. The QC Vice Manager answers questions that relate to the standard and other parts supported by her team. Management let auditors to have direct access to the workers for interview.
VAP-Info30.2	Process and summary: Worker attitude	The facility management agrees that auditors conduct group and individual interviews with workers confidentially. Workers are chosen within the audit scope freely without any influence by the facility management. Auditors randomly select 20 workers from different production workshops, gender, age and positions for formal interview in a meeting room without being interrupted. All workers are open and cooperative during the interview, and all of them are satisfied with the benefits and work conditions of the facility.
VAP-Info30.3	Process and summary: Process Integrity	The last month's wages of April 2022 have not been paid which was in line with the local legal law.
VAP-Info30.4	Process and summary: Closing meeting	The close meeting is held at 13:30 pm on May 6, 2022, QC Vice General Manager, QC Vice Manager, Management Department Manager, Facility Director and Management Department Engineer attend the meeting. The audit result has been reviewed and agreed by the management during the closing meeting. All findings are communicated to management and facility representatives in audit process and communicated again in closing meeting. The facility representatives fully agree the audit findings without any comment.
VAP-Info30.5	Process and summary: Exception management	The last month's wages of April 2022 have not been paid which was in line with the local legal law.

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VAP-Info30.6	Process and summary: Legal Nonconformance Risks	<p>Total 14 non-compliances for legal findings are identified and showed as below:</p> <p>Labor: A3.1: Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/ workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function. [Labor Law of the People’s Republic of China (2018 Amendment), Article 41 /中华人民共和国劳动法 (2018修正) 第四十一条 The employing unit may extend working hours due to the requirements of its production or business after consultation with the trade union and laborers, 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 laborers is guaranteed. However, the total extension in a month shall not exceed thirty-six hours. / 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。]</p> <p>A3.2: Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022</p>
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	<p>(random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 38 /中华人民共和国劳动法 (2018修正) 第三十八条 The employing unit shall guarantee that its staff and workers have at least one day off in a week. / 用人单位应当保证劳动者每周至少休息一日。]</p> <p>A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. [Regulations on Paid Annual Leave for Employees (2007), Article 3 / 职工带薪年休假条例 (2007) 第三条 Where an employee has served one full year but less than 10 years accumulatively, he is entitled to five days of annual leave. If he has served 10 full years but less than 20 years, annual leave is 10 days. If he has served for 20 full years, annual leave is 15 days. / 职工累计工作已满1年不满10年的, 年休假5天; 已满10年不满20年的, 年休假10天; 已满20年的, 年休假15天。]</p> <p>A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). [Regulation on the Payment of Wages in Guangdong Province (2016 Amendment), Article 13 /广东省工资支付条例 (2016修正) 第十三条 If the labor relationship between the employer and the laborer is discharged or terminated in accordance with the law, wages shall be paid to laborers in full at once on the date when the labor relation is terminated or discharged. / 用人单位与劳动者依法终止或者解除劳动关系的, 应当在终止或者解除劳动关系当日结清并一次性支付劳动者工资。]</p> <p>A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. [Regulation on the Administration of Housing Provident Fund (revised in 2002)/住房公积金管理条例 (2002修订) Housing Provident Fund regulations apply to the workers in all geographic regions of the country, whether they are migrant workers registered elsewhere or residential workers registered in the city where they are working. Article 15 Units shall register employee's information in housing provident fund management center since employee joins the units,</p>	<p>(random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function. [Labor Law of the People's Republic of China (2018 Amendment), Article 38 /中华人民共和国劳动法 (2018修正) 第三十八条 The employing unit shall guarantee that its staff and workers have at least one day off in a week. / 用人单位应当保证劳动者每周至少休息一日。]</p> <p>A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length. [Regulations on Paid Annual Leave for Employees (2007), Article 3 / 职工带薪年休假条例 (2007) 第三条 Where an employee has served one full year but less than 10 years accumulatively, he is entitled to five days of annual leave. If he has served 10 full years but less than 20 years, annual leave is 10 days. If he has served for 20 full years, annual leave is 15 days. / 职工累计工作已满1年不满10年的, 年休假5天; 已满10年不满20年的, 年休假10天; 已满20年的, 年休假15天。]</p> <p>A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month). [Regulation on the Payment of Wages in Guangdong Province (2016 Amendment), Article 13 /广东省工资支付条例 (2016修正) 第十三条 If the labor relationship between the employer and the laborer is discharged or terminated in accordance with the law, wages shall be paid to laborers in full at once on the date when the labor relation is terminated or discharged. / 用人单位与劳动者依法终止或者解除劳动关系的, 应当在终止或者解除劳动关系当日结清并一次性支付劳动者工资。]</p> <p>A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers. [Regulation on the Administration of Housing Provident Fund (revised in 2002)/住房公积金管理条例 (2002修订) Housing Provident Fund regulations apply to the workers in all geographic regions of the country, whether they are migrant workers registered elsewhere or residential workers registered in the city where they are working. Article 15 Units shall register employee's information in housing provident fund management center since employee joins the units,</p>
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	<p>set housing provident fund account for employee in the entrusted bank with the approved documents from housing provident fund center. Article 16 Contributions both for employee and unit must be calculated based on each worker's average monthly wage over the last year. Article 18 Different regions may establish variable housing provident fund rates, as decided by local governments, but contributions may not fall below a minimum of five percent (5%) of the monthly wage. / 第十五条单位录用职工的，应当自录用之日起30日内到住房公积金管理中心办理缴存登记，并持住房公积金管理中心的审核文件，到受委托银行办理职工住房公积金账户的设立或者转移手续。第十六条职工住房公积金的月缴存额为职工本人上一年度月平均工资乘以职工住房公积金缴存比例。单位为职工缴存的住房公积金的月缴存额为职工本人上一年度月平均工资乘以单位住房公积金缴存比例。第十八条职工和单位住房公积金的缴存比例均不得低于职工上一年度月平均工资的5%；有条件的城市，可以适当提高缴存比例。具体缴存比例由住房公积金管理委员会拟订，经本级人民政府审核后，报省、自治区、直辖市人民政府批准]</p> <p>Health and Safety:</p> <p>B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.[Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 24/危险化学品安全管理条例 (2013修订) 第二十四条. Hazardous chemicals shall be stored at designated warehouses, sites or store rooms and managed by designated persons./ 危险化学品应当储存在专用仓库、专用场地或者专用储存室内，并由专人负责管理；]</p> <p>B1.3 Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.[Production Safety Law of the People's Republic of China (2014 Amendment), Article 42/中华人民共和国安全生产法 (2014修正) 第四十二条 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules./ 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。]</p> <p>B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible,</p>	<p>set housing provident fund account for employee in the entrusted bank with the approved documents from housing provident fund center. Article 16 Contributions both for employee and unit must be calculated based on each worker's average monthly wage over the last year. Article 18 Different regions may establish variable housing provident fund rates, as decided by local governments, but contributions may not fall below a minimum of five percent (5%) of the monthly wage. / 第十五条单位录用职工的，应当自录用之日起30日内到住房公积金管理中心办理缴存登记，并持住房公积金管理中心的审核文件，到受委托银行办理职工住房公积金账户的设立或者转移手续。第十六条职工住房公积金的月缴存额为职工本人上一年度月平均工资乘以职工住房公积金缴存比例。单位为职工缴存的住房公积金的月缴存额为职工本人上一年度月平均工资乘以单位住房公积金缴存比例。第十八条职工和单位住房公积金的缴存比例均不得低于职工上一年度月平均工资的5%；有条件的城市，可以适当提高缴存比例。具体缴存比例由住房公积金管理委员会拟订，经本级人民政府审核后，报省、自治区、直辖市人民政府批准]</p> <p>Health and Safety:</p> <p>B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.[Regulations on the Safety Management of Hazardous Chemicals (2013 Revision), Article 24/危险化学品安全管理条例 (2013修订) 第二十四条. Hazardous chemicals shall be stored at designated warehouses, sites or store rooms and managed by designated persons./ 危险化学品应当储存在专用仓库、专用场地或者专用储存室内，并由专人负责管理；]</p> <p>B1.3 Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.[Production Safety Law of the People's Republic of China (2014 Amendment), Article 42/中华人民共和国安全生产法 (2014修正) 第四十二条 A business entity must provide labor protection articles that meet the national standards or industrial standards to the employees, supervise and educate employees to wear and use these articles according to the prescribed rules./ 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。]</p> <p>B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible,</p>
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		<p>and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&amp;B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters. [Fire Prevention Law of the People's Republic of China (2019 Amendment), Article 16/中华人民共和国消防法（2019修正）第十六条 Organs, social groups, enterprises, public institutions and other entities shall perform the following fire safety duties: 4. to ensure that the evacuation passages, safety exits and fire truck passages are clear and the fire and smoke compartmentation and fire separation distance meet the relevant fire protection technical standards;机关、团体、企业、事业等单位应当履行下列消防安全职责：（四）保障疏散通道、安全出口、消防车通道畅通，保证防火防烟分区、防火间距符合消防技术标准；]</p> <p>B3.1 Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards. [Law of the People's Republic of China on Prevention and Control of Occupational Diseases (2018 Amendment), Article 35/中华人民共和国职业病防治法（2018修正）第三十五条 For employees conducting operations with exposure to occupational disease hazards, an employer shall organize pre-job, on-the-job, and off-the-job occupational medical examination of employees according to the provisions of the health administrative department of the State Council and inform in writing employees of the examination results./ 对从事接触职业病危害的作业的劳动者，用人单位应当按照国务院卫生行政部门的规定组织上岗前、在岗期间和离岗时的职业健康检查，并将检查结果书面告知劳动者。]</p> <p>B4.1 Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors. [Provisions on the Supervision and Administration of Occupational Health at Work Sites (2012), Article 20/工作场所职业病卫生监督管理规定（2012）第二十条 The employer with serious occupational disease</p>
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		<p>hazards shall entrust the accredited occupational health technical service institutions to conduct present situation assessment of occupational disease hazards once every three years at least besides meet the previous article./ 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。]</p> <p>B6.2 A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A. [General Rules of Design on Health and Safety of Production Facility (GB 5083-1999), article 6.1.2/生产设备安全卫生设计总则 (GB 5083-1999) 第6.1.2条 Necessary safeguard shall be installed for all moving parts that are accessible to the operator during machine operation./ 对操作人员在设备运行时可能触及的可动零部件，必须配置必要的安全防护装置。]</p> <p>B7.1 Required health &amp; safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings. [Provisions on the Supervision and Administration of Fire Protection of Construction Projects (2012 Revision), Article 13/建设工程消防监督管理规定 (2012修订) 第十三条 For a people-intensive premise under one of the following circumstances, the construction unit thereof shall apply to the fire protection division of the public security organ for the fire protection design review, and shall apply for a fire protection as-built acceptance to the fire protection division of the public security organ which has issued the fire protection design review opinions after the completion of the construction project.(5) It is ...the staff collective dormitory of a labor-intensive enterprise with the total construction area of more than 1,000 square meters./ 对具有下列情形之一的人员密集场所，建设单位应当向公安机关消防机构申请消防设计审核，并在建设工程竣工后向出具消防设计审核意见的公安机关消防机构申请消防验收：（五）建筑总面积大于一千平方米的……劳动密集型企业的员工集体宿舍； Administrative Measures for Protecting against and Mitigating Thunder and Lightning Disasters (2013 Amendment), Article 19/防雷减灾管理办法 (2013修改) 第十九条.After being put into use, a regular inspection system shall be established for the thunder protection devices. Thunder protection devices shall be tested once a year./ 投入使用后的防雷装置实行定期检测制度。防雷装置应当每年检测一次。]</p> <p>B7.2 Dormitories are clean, safe and well maintained</p>
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		<p>and most facilities meet international housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment)10.3.5/建筑设计防火规范 (GB 50016-2014 , 2018修正 ) 第10.3.5条 Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment) 10.3.5 Light evacuation indicating sign shall be installed along the evacuation passageway of public building, residential building higher than 54m, high-rise factory building (storage) and single, multi-storey Class A, B, C factory building, and shall meet the following requirements:1. It shall be installed at the place right over the exit and the evacuation door of the staff-intensive place./ 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; ]</p> <p>Environmental: C3.1 Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.</p> <p>[Code of Design on Building Fire Protection and Prevention (GB 50016-2014, 2018 Amendment), Article 3.6.12/建筑设计防火规范 (GB 50016-2014 , 2018修正 ) 3.6.12 Facilities capable of preventing liquids from flooding and spreading shall be provided in storage storing Class A, B and C liquids. Stores of items that are subject to fire and explosion in case of damp shall be protected against water immersion./ 甲、乙、丙类液体仓库应设置防止液体流散的设施。遇湿会发生燃烧爆炸的物品仓库应采取防止水浸渍的措施。</p> <p>Standard on Pollution Control of Hazardous Waste Storage (GB 18597-2001 / XG 1-2013), Article 6.3.9/ 危险废物贮存污染控制标准 (GB 18597-2001 / XG 1-2013 ) 6.3.9 Hazardous waste storage shall be wind-proof, rain-proof and sun-proof./ 危险废物堆要防风、防雨、防晒。]</p>
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VAP-Info30.7	Process and summary: Executive summary	<p>The Validated initial audit of HUA JUNG ELECTRONICS (GUANG DONG) CO., LTD. is evaluated the facility's labor, ethics, occupational health &amp; safety, environmental practices, and supporting management systems against the requirements of the RBA Code 7.0.1, relevant local rules and regulations, national legislation. The audit is performed during May 5, 2022 to May 6, 2022. The duration is 3-person days for 2 auditors. No integrity issues are encountered during the audit. The Workforce Composition Survey was not received according to management interview. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. There are 1 priority non-compliance and 14 major non-compliances identified by the audit team.</p> <p>Summary of Priority Finding:  Health and Safety: B2.4 Emergency exit access, exits, and exit discharge are adequate in number and location in most workshops, most exits are readily accessible, and properly maintained. However, legal non-compliance: There are only one exit available for three areas, one safety exit is locked: 1. The finished goods warehouse in 1st floor of production building B# is about 1000 square meters, one exit available in the warehouse. 2. One exit available in the winding workshop on the 3rd floor of production building A#, which is about 600 square meters, there are about 13 workers work in there in normal weekdays. 3. One exit available in the A&amp;B workshop on the 3rd floor of production building A#, which is about 500 square meters, there are about 20 workers work in there in normal weekdays. 4. 1 out of 2 safety exits in materials warehouse on 3rd floor of production building A# is locked, the warehouse is about 500 square meters.</p> <p>Summary of Major Findings:  Labor: A3.1: Hours worked in a workweek over the last 12 months exceed 60 hours and overtime hours exceed local law. No obvious peak/non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) are reviewed. The highest weekly working hours are 62 hours/ workweek, the highest monthly overtime hours are 104 hours, the highest daily overtime hours are 4 hours a) Above or equal to 60 h/ workweek and below 72 h/workweek: a. a) Average =3.8% with highest of 62 hours a. b) October 2021 (random) = 0% with a highest of 60 h/workweek a. c) November 2021 (random) = 11% with a highest of 62 h/workweek a. d) April 2022 (random)= 0% with a highest of 60 h/workweek b) Average = 95% with a highest of 104 OT hours per month b. a) October 2021 (random) = 90% with a highest of 104 h/month b. b) November 2021 (random)= 95% with a highest</p>
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		<p>of 92 h/month b. c) April 2022 (random) = 100% with a highest of 70 h/ month c) Average = 5% with a highest of 4 OT hours per day c. a) October 2021 (random) = 0% with a highest of 2 h/day c. b) November 2021 (random)= 15% with a highest of 4 h/ day c. c) April 2022 (random) = 0% with a highest of 2 h/ day d) The same working hour trend is found by production area, by nationality and job function.</p> <p>A3.2: Workers do not receive at least one day off every seven days. No obvious peak/ non-peak season observed. The facility does not have COVID19 recovery plan. The months of October 2021 (random), November 2021 (random) and April 2022 (random) were reviewed. The longest consecutive working days are 12 days worked a) Above or equal to 7 and below 12 consecutive days worked: a. a) Average = 30 % with a highest of 12 consecutive days worked a. b) October 2021 (random) = 0 % with a highest of 6 consecutive days worked a. c) November 2021 (random) = 0 % with a highest of 6 consecutive days worked a. d) April 2022 (random) = 90 % with a highest of 12 consecutive days worked d) The same consecutive days worked trend is found by production area, by nationality and job function.</p> <p>A3.3: The Policy and procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours. However, the working hours controls are found to be in non-conformance of workers' overtime hours and weekly working hours, one day off per 7 are not in line with legal and RBA requirements. The highest weekly working hours are 62 hours/ workweek, the highest overtime hours are 4 hours/ day and 104 hours/ month, the longest consecutive working days are 12 days worked.</p> <p>A3.4: Workers are allowed mandated breaks, holidays, and vacation days, including time off when ill or for maternity leave, however, legal non-compliance, the facility provided paid annual leave to workers according to workers' service length in the facility instead of workers' society service length.</p> <p>A4.2: For each pay period, workers are paid timely and provided with understandable wage statements that includes sufficient information to verify accurate compensation for work performed, however, legal non-compliance, the facility does not pay wage for resign workers on the date when the labor relation is terminated or discharged. Wages of resigned workers are not paid within the day of labor terminated but paid at the next wages issue date (20th of the following month).</p> <p>A4.4: Deductions or withholdings are calculated and submitted to the appropriate government agency within the local law time frame, however, legal non-compliance, the facility does not provide housing provident fund for 68.57% (240 out of 350) workers.</p>
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		<p>Health and Safety:</p> <p>B1.2 Potential for worker exposure to other energy sources, fire, vehicles, and fall hazards are identified, assessed and mitigated using the Hierarchy of Controls. However, legal non-compliance: Four buckets of thinners are stored with other materials in finished goods warehouse on the 1st floor of production building B#.</p> <p>B1.3 Personal Protective Equipment (PPE) are required to control health &amp; safety hazards and worker exposure. Most workers wear proper PPEs during operation. However, legal non-compliance: 1. The facility provides medical masks for the workers work in dispensing positions in A&amp;B(Axial&amp;Box) workshop on the 3rd Floor of production building A#; 2. Four workers in grading workshop do not wear earplugs during operation on the 2nd floor of production building A#.</p> <p>B3.1 Required programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The factory does not provide off-the-job occupational medical examination for the workers work with occupational disease hazards.</p> <p>B4.1 Required testing reports for potential Industrial hygiene exposures are in place and a process is implemented to ensure permits and licenses are up to date at all times. However, legal non-compliance: The facility does not conduct evaluations of the occupational disease hazard factors.</p> <p>B6.2 A machine-safeguarding program is implemented and workers operate machinery safely. However, legal non-compliance: The safety guards for two grading machines are broken on the 2nd floor of production building A.</p> <p>B7.1 Required health &amp; safety licenses, permits, registrations and certificates related to food, sanitation and housing are in place and an adequate and effective process is established to ensure permits and licenses are up-to-date at all times. However, legal non-compliance: 1. The facility does not obtain the fire license or register certificate for two 6-storey dormitory buildings. 2. The facility does not obtain the test report for thunder protection devices of two 6-storey dormitory buildings.</p> <p>B7.2 Dormitories are clean, safe and well maintained and most facilities meet international housing standards. However, legal non-compliance: There is no exit sign for all fire exits in two 6-storey dormitory buildings.</p> <p>Environmental:</p> <p>C3.1 Hazardous substances including wastes are categorized, labelled, handled, transported and disposed using government-approved and licensed vendors. However, legal non-compliance: 1. There is no secondary containment for 10% hazardous chemicals in factory, including four buckets of thinner</p>
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		stored on 1st floor of production building B#, one bucket of alcohol stored in grading workshop. 2. One bucket of hydraulic oil is stored in the open area beside the east exit on 1st floor of production building A#.
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