

Monitored Party <b>ChangZhou Puline Electronics Co., Ltd</b>	amfori ID <b>156-036439-000</b>	Address <b>No.21, Mingban Road, Nanxiashu Street, Wujin National High-tech Industrial Development Zone, 213167 Changzhou, Jiangsu Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>ELEVATE</b>
Monitoring Start Date <b>21/08/2024</b>	Closing Meeting Finished Date <b>21/08/2024</b>	Submission Date <b>28/08/2024</b>
Expiration Date <b>28/08/2025</b>	Announcement Type <b>Fully Announced</b>	
Site <b>ChangZhou Puline Electronics Co., Ltd.</b>	Site amfori ID <b>156-036439-002</b>	

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## OVERALL RATING



## SECTION RATING

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

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

## GENERAL DESCRIPTION

Name of lead auditor: Jifeng Dong, APSCA membership number: CSCA 21701137

Monitoring partner name (audit company): ELEVATE.

Audit schedule details: The audit was planned for 1 auditor x 1 day. The full audit (Fully Announced) was conducted on August 21, 2024.

Business partner information: ChangZhou Puline Electronics Co., Ltd is located at No.21, Mingban Road, Nanxiashu Street, Wujin National High-tech Industrial Development Zone, Changzhou City, Jiangsu Province and China. The factory address is the same with BSCI platform and BL and actual production site. Factory started their operation in 2012 and moved to current address since 2022. The factory's local name is “常州市普行电子有限公司(91320412590009741C)”.

Audited location information: In view of the factory, the building area used by the audited factory was around 2909 square meters. The factory occupied 1 block of 3-storey production building as office, workshops and warehouses. No kitchen, canteen or dormitory was provided for workers' use. No shared building or shared worker was found during the audit.

Operating shifts and hours: Attendance records from July 2023 to audit day and payroll records from July 2023 to June 2024 were reviewed in this audit. By cross check those records, production records and interview with the management, workers and worker representative, the regular working time was 8 hours per day and 5 days per week; all workers worked in 1 shift from 7:30 to 17:00 with 1.5 hours lunch break from 11:30 to 13:00, and had overtime work from 18:00 to 20:00 and on Saturday for 8 hours. They always rested on Sundays and public holidays.

Time recording system: Factory used the fingerprinting attendance system for time recording.

Salary payment details: All employees' wages were calculated by hourly rate, the lowest basic wage was RMB 16.1 per hour, which was above the legal requirement of RMB 13.10 per hour before January 1, 2024 and RMB 14.31 per hour since January 1, 2024; for overtime wages, 150% and 200% of basic wages were paid to employees for their overtime hours on workdays and rest days respectively, no overtime was arranged on public holidays. Employees were paid in cash at the end of the following month. Auditor had reviewed the social insurance records for recent 6 months, a total of 13 employees (excluding 4 retired employees) were eligible to receive five types of social insurances in August 2024 according to the law. However, through review of social insurance enrolment list in August 2024, only 7 employees (53.8% of total eligible employees) was enrolled in occupational injury insurance, medical insurance, child-bearing insurance, pension insurance and unemployment insurance. Remarks: Other workers wanted to save money and did not want to pay for social insurance. The factory bought commercial injury insurance for all employees with the valid periods from April 21, 2024 to April 20, 2025; but no waiver was obtained by the factory.

Worker number information: Based on the audit booking, there are total 17 employees in the factory, including 5 male employees and 12 female employees currently working in the factory. No children or young workers worked in the factory, and the youngest employee was 19 years old. There were 13 production employees (including Testing, inspection and packing and warehouse) and 4 non-production employees (including management person, office worker etc.).

Good practices: None

Worker organization details: There was no Trade Union or worker committee available in the factory, but there was 1 worker representative selected by workers.

Circumstances: The factory management and workers were positive for this audit, auditor well communicated all non-compliances to factory already, finally factory signed the onsite CAP, and auditor left factory.

Summary of findings: The performance areas which needed improvement were as follows: PA1, PA2, PA5, PA6, PA7 & PA12.

Living wage calculation: This audit was used Anker Methodology to collect factory's living wage data. Factory calculated the living wage by themselves, and auditor accepted it.

Remarks: The factory provided the house proprietary certificates for the used building, but the Building Construction Safety Approvals was not provided due to the landlord missed the document. Normally, house proprietary certificate only could be obtained after the factory had the Building Construction Safety Approval, so auditor accepted it.

## SITE DETAILS

Site	Site amfori ID
<b>ChangZhou Puline Electronics Co., Ltd.</b>	<b>156-036439-002</b>

### GICS Classification

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Sector	Industry Group	Industry
<b>Consumer Discretionary</b>	<b>Consumer Durables &amp; Apparel</b>	<b>Household Durables</b>
Sub Industry		
<b>Consumer Electronics</b>		

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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Manufacture of consumer electronics

### Water Stress Situation

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This site is not located in a water stressed region

# METRICS

## Key Metrics

Total workforce	17	Workers
Legal minimum wage in local currency	2,490	Monthly
Lowest wage paid for regular work at the site	2,800	Monthly
Calculated living wage in local currency	2,502	Monthly
Total sample	5	Workers

## Other Metrics

Male workers	5	Workers
Female workers	12	Workers
Non-binary workers	0	Workers
Permanent workers - Male	5	Workers
Permanent workers - Female	12	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	1	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	2	Workers
Domestic migrant workers - Female	7	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	5	Workers
Workers hired directly - Female	12	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	2	Workers
Sample - Female	3	Workers
Sample - Non-binary	0	Workers

# FINDINGS



## PA1: Social Management System

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>Based on documents review, factory tour and management &amp; worker interview, the main auditee partially respected this principle. Because the main auditee had set up the management system to implement the amfori BSCI Code of Conduct. However, during the audit, it was noted that the management system was not fully implemented due to there were some non-compliances noted in PA1, PA2, PA5, PA6, PA7 and PA12. (In accordance with amfori BSCI Code of Conduct)</p>	<p>根据文件审阅，现场查看，管理层和工人访谈发现，工厂部分遵循此项准则。因为工厂建立了一个管理系统来符合amfori BSCI 准则。但是在这次审核中审核员发现这个管理系统还不能有效实施，因为工厂在PA1，PA2，PA5，PA6，PA7和PA12领域都还存在缺失。(根据 amfori BSCI 行为准则)</p>

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>Based on documents review, management &amp; worker interview, the main auditee partially respected this principle. Because the main auditee had set up one workforce capacity procedure and try to control the overtime hours within the legal requirement. However, during the audit, it was noted that the factory did not limit the overtime hours well, all sampled workers' monthly overtime had exceeded the legal requirement. (In accordance with amfori BSCI Code of Conduct)</p>	<p>根据文件审阅，管理层和工人访谈发现，工厂部分遵循此项准则。因为工厂已经建立了生产能力评估程序，尝试控制工作时间在法律要求之内。但是在此次审核过程中，审核员发现工厂加班工时管控措施不到位，因为所有抽样工人的月加班时间有超过法规要求的情况。(根据 amfori BSCI 行为准则)</p>



## PA 2: Workers Involvement and Protection

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

**Question:** 2.5 Is there satisfactory evidence that the auditee has established, or participates in, an effective operational-level grievance mechanism for individuals and communities?

ENGLISH	LOCAL LANGUAGE
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### Finding

Based on documents review, management & worker interview, the main auditee partially respected this principle. Because the main auditee had set up one grievance policy to manage the complaint. There was suggestion box set for workers to complain their concerns and workers also could talk to representative or supervisors face to face directly. However, the provided grievance records showed there no complaint was reported by workers in last 12 months, but the factory did not conduct survey on the user satisfaction with its grievance process to identify the reasons. (In accordance with amfori BSCI Code of Conduct)

根据文件审阅，管理层和工人访谈发现，工厂部分遵循此项准则。因为工厂建立了一个申诉程序来管理申诉。工厂有设置意见箱供工人提出他们的担忧，工人也可以直接与代表或主管面对面交谈。但是，在此次审核过程中，审核员发现记录显示工厂过去12个月还没有收到过申诉，被审核方也没有进行对申诉流程的满意度调查来识别这个原因。(根据 amfori BSCI 行为准则)

## PA 5: Fair Remuneration

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

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

### ENGLISH

### LOCAL LANGUAGE

### Finding

Based on documents review, management & worker interview, the main auditee did not respect this principle. Because the factory did not provide social insurance for all employees, a total of 13 employees (excluding 4 retired employees) were eligible to receive five types of social insurances in August 2024 according to the law. However, through review of social insurance enrolment list in August 2024, only 7 employees (53.8% of total eligible employees) was enrolled in occupational injury insurance, medical insurance, child-bearing insurance, pension insurance and unemployment insurance. Remarks: Other workers wanted to save money and did not want to pay for social insurance. The factory bought commercial injury insurance for all employees with the valid periods from April 21, 2024 to April 20, 2025; but no waiver was obtained by the factory. (In accordance with Social Insurance Act of the People's Republic of China, article 2&4)

根据文件审阅，管理层和工人访谈发现，工厂没有遵循此项准则。因为工厂没有按照法规要求为所有员工购买社会保险。根据工厂提供的社保缴费记录查看，在2024年8月共有13名员工符合参保资格（没有包括4名退休员工），但是只有7名员工（符合条件员工的53.8%）参加了工伤保险，医疗保险，生育保险，养老保险和失业保险。备注：其他工人想存更多的钱而不想花费在社保上。工厂给所有员工购买了商业工伤保险，有效期从2024年4月21日到2025年4月20日，也没有社保批文。（根据《中华人民共和国社会保险法》第二条和第四条）

## PA 6: Decent Working Hours

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>Based on documents review, management &amp; worker interview, the main auditee did not respect this principle. Because it was noted that the monthly overtime hours of 5 out of 5 randomly selected workers exceeded 36 hours in June 2024 with the highest of 64 hours; 5 out of 5 randomly selected workers exceeded 36 hours in May 2024 with the highest of 62 hours; 5 out of 5 randomly selected workers exceeded 36 hours in December 2023 with the highest of 64 hours. (In accordance with PRC Labor Law article 41)</p>	<p>根据文件审阅，管理层和工人访谈发现，工厂没有遵循此项准则。因为在此次审核过程中，审核员发现抽样月份2024年6月，随机抽取的5名工人中有5名工人的月加班时间超过36小时，最高达到64小时；在2024年5月，随机抽取的5名工人中有5名工人的月加班时间超过36小时，最高达到62小时；在2023年12月，随机抽取5名工人中有5名工人的月加班时间超过36小时，最高达到64小时。（根据《中华人民共和国劳动法》第41条）</p>

## PA 7: Occupational Health and Safety

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>Based on documents review, factory tour, management &amp; worker interview, the main auditee partially respected this principle. Because the main auditee had set up one health and safety management system to manage the health and safety condition in the factory, including established one EHS workers and management committee, regular internal assessment, regular health and safety check, regular meetings and trainings and etc. However, due to lack of awareness and imperfect management, some health and safety issues were noted in this audit. (In accordance with amfori BSCI Code of Conduct)</p>	<p>根据文件审阅，现场查看，管理层和工人访谈发现，工厂部分遵循此项准则。因为工厂已有建立了健康安全管理体系，包括成立工人和管理层的健康安全委员会，定期的内审，定期健康安全检查和会议和培训等。但是由于意识不足和管理不完善，在审核过程中还是有一些健康安全问题发现。（根据 amfori BSCI 行为准则）</p>

**Question:** 7.7 Is there satisfactory evidence that the auditee implements engineering and administrative control measures to avoid or minimise the release of hazardous substances into the work environment, keeping the level of exposure below internationally established or recognised limits?

ENGLISH	LOCAL LANGUAGE
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Finding	
Based on factory tour, management & worker interview, the main auditee partially respected this principle. Because the main auditee provided MSDS and second container for the chemical used in the factory. However, no chemical label was posted for 2 bottles of alcohol used on the 2F of the production building in the factory. (In accordance with Regulation For Chemical Usage Safety in Workplace, article 12).	根据现场查看，管理层和工人访谈发现，工厂部分遵循此项准则。因为现场的化学品有物质安全数据表和二次容器。但是在此次审核过程中，审核员发现工厂厂房2楼储存的2瓶酒精没有张贴化学品标签。（根据《工作场所安全使用化学品的规定》第十二条）。

Question: 7.22 Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?	
ENGLISH	LOCAL LANGUAGE
Finding	
Based on factory tour, management & worker interview, main auditee partially respected this principle. Because the main auditee had provided sufficient toilets for workers. However, it was noted that no toilet papers were provided for the toilets on the 1/F and 2/F of the production building in the factory. (In accordance with amfori BSCI Code of Conduct).	根据现场查看，管理层和工人访谈，工厂部分遵循此项准则。因为工厂给工人提供了充足厕所。但工厂厂房1楼和2楼的厕所没有提供纸巾。（根据 amfori BSCI 行为准则）。

## PA 12: Protection of the Environment

Site: ChangZhou Puline Electronics Co., Ltd. | Site amfori ID: 156-036439-002

Question: 12.1 Is there satisfactory evidence that the auditee continuously identifies the significant impacts and environmental implications associated to its activity?	
ENGLISH	LOCAL LANGUAGE
Finding	
Based on documents review, management & worker interview, the main auditee partially respected this principle. Because the factory had established some environmental procedures and conducted regular environmental risk assessment. However, it was noted that there was no grievance mechanism in place to address the environmental impact of surrounding communities. (In accordance with amfori BSCI Code of Conduct)	根据文件审阅，现场查看，管理层和工人访谈发现，工厂部分遵循此项准则。因为工厂有制定一些环境程序，也进行了定期环境风险评估。但在此次审核过程中，审核员发现目前还没有建立有关周边社区对于其造成的环境影响的申诉机制。（根据 amfori BSCI 行为准则）