

Validated Audit Report

Audit Reference Number	VAR-20200714-CN-04A01-2
Audited Facility	VICTORY GIANT TECHNOLOGY (HUI ZHOU)CO.,LTD.
Audit Date	07/14/2020
Overall Audit Score	151.2
Disclaimer	To the knowledge of RBA, the APSCA number listed is accurate as of the date hereof. Listing of the APSCA number herein is not in any way an endorsement by RBA of APSCA. RBA is not an affiliate of APSCA, and RBA is not liable for any losses, expenses or damages of any nature, including, without limitation, special, incidental, punitive, direct, indirect or consequential damages or lost income or profits, resulting from or arising out of reliance or use of the APSCA number.

Conformance Results

Overall Score	Conformance	Risk of NC	Minor NC	Major NC	Priority NC	Opportunity for Improvement	Total Scored Questions	Not Applicable Questions
151.2	73	0	1		0	0	81	0

*NC= Non-conformance to RBA Code of Conduct

Audit Information		Facility Information	
Audit Reference Number	VAR-20200714-CN-04A01-2	Company Name	VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD.
Audit Start Date	07/14/2020	Facility Name	VICTORY GIANT TECHNOLOGY (HUI ZHOU)CO.,LTD.
Closing Meeting Date	07/17/2020	RBA Facility ID	G-FA-10001082
Audit Type	Initial Audit	Facility Address	Xing Cheng science and Technology Park,Xinqiao Town,Huiyang District
Audit Firm	Greenment	Facility Country	China
Audit Category	VAP	Facility Point Of Contact	
Auditor	Tomy Hanfu Cai hanfu.cai@greenment.net Jerry Chen angming.chen@greenment.net	Total Number Of Workers	46

Executive Summary

The validated initial audit of VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD. evaluates the facility's labor, ethics, occupational health & safety and environmental practices and supporting management systems against the RBA audit criteria as contained in the RBA audit protocol 6.1.0 and applicable laws and regulations. The audit takes place on July 14 to 17, 2020. 2 RBA Auditors spend a total 8 person-days on site. It is a full scope audit of all manufacturing buildings and common spaces. No integrity issues are encountered during the audit. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. The findings include 7 Major non-conformances and 1 Minor non-conformance against the audit criteria. Summary of Major non-conformances: Labor: A3.1 Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours. a) Between 72 h/workweek and 84 h/workweek: a.a) Average = 1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) = 0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours. d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours. A3.3 Adequate 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. However, the working hours control system are ineffective implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that major non-conformance in A3.1 and Minor non-conformance in A3.2 are detected. A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year. Health& Safety: B1.1b Environment: Required permits, licenses and test reports for health

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Validated Audit Report

& safety is in place and a process is implemented to ensure permits and licenses are up to date at all times, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production building. B2.1b 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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. B6.2b Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. Environment: C3.1b Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building.

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	153.7	20	0	1	3	0	0	24	0
B) Health & Safety	160.7	19	0	0	3	0	0	22	0
C) Environment	179.3	11	0	0	1	0	0	12	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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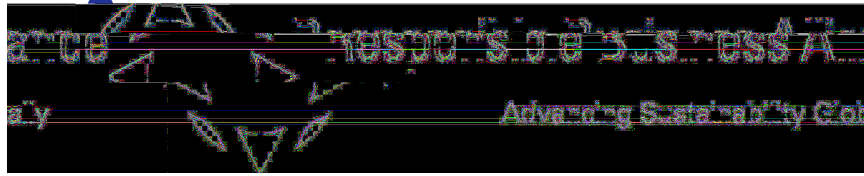
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Business Adv
Sustainability Global

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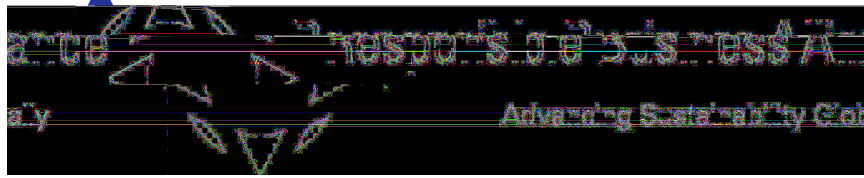
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<p>Conclusion</p>	<p>Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours.</p> <p>a) Between 72 h/workweek and 84 h/workweek: a.a) Average =1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) =0%</p> <p>c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours.</p> <p>d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hour d.b) June 2019 (random) = 4.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours</p> <p>[PRC Labor Law article 41, effective from December 29, 2018, the employer 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. / 《中华人民共和国劳动法》第41条2018年12月29日实施。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>Question #</p>	<p>VAP-A3.2</p>
<p>Subsection Name</p>	<p>WORKING HOURS</p>
<p>Question Text</p>	<p>Workers receive at least one (1) day off every seven (7) days</p>
<p>Rating</p>	<p>Minor Non-Conformance</p>
<p>Conclusion</p>	<p>Workers do not receive at least one day off every seven days. There is no obvious peak or non-peak month in the factory. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled. The longest consecutive working days are 22 days worked</p> <p>a) Between 12 and 24 consecutive days worked: a.a) Average = 1.9% with a highest of 22 consecutive days worked a.b) June 2019 (random month) = 6% with a highest of 22 consecutive days worked a.c) For April 2020 (random) = 0% a.d) For May 2020 (random) = 0% b) Between 7 and 12 consecutive days worked: b.a) Average =6.7% with a highest of 9 consecutive days worked b.b) June 2019 (random month) = 20% with a highest of 9 consecutive days worked b.c) April 2020 (random) = 0% b.d) May 2020 (random) = 0%</p> <p>[The Labor Law of the PRC, article 38, effective from December 29, 2018, Employing units are to guarantee that employees have at least one day off a week. / 《中华人民共和国劳动法》第38条, 2018年12月29日生效, 用人单位应当保证劳动者每周至少休息一天。]</p>
<p>Question #</p>	<p>VAP-A3.3</p>

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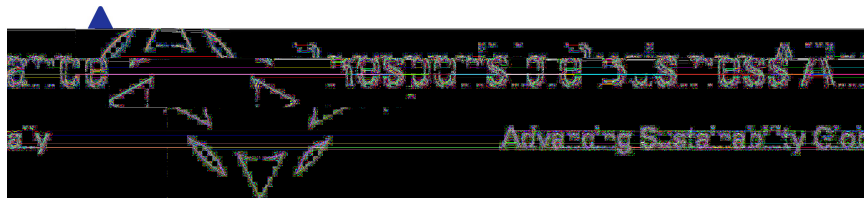
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Subsection Name	WORKING HOURS
Question Text	Adequate and effective policy and system/procedures are established to determine, communicate, record, manage and control working hours including overtime, including reliable and detailed records of workers' regular and overtime working hours
Rating	Major Non-Conformance
Conclusion	Adequate 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. However, the working hours control system are ineffective implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that major non-conformance in A3.1 and Minor non-conformance in A3.2 are detected.
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 correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-conformance is found, the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB33927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year. [The Notice about The Standardized Requirement of Social Insurance Contribution Base (2006)60]: effective date: November 15, 2006, In the principle, the worker in the unit should pay the employment insurance based on him-self's average monthly wage of the previous year. The base for the unit to pay for medical insurance, unemployment insurance, industrial injury insurance, and maternity insurance are the workers' total wage of the previous year. For the individual contribution of medical insurance and unemployment insurance, the base is the worker's monthly salary, it is calculated based on average wage of last 12 months for convenience. / 《劳社险中心函[2006]60号》, 生效时间: 2006年11月15号, 单位职工本人缴纳基本养老保险的基数原则上以上一年度本人月平均工资为基础, 参保单位缴纳基本医疗保险、失业保险、工伤保险、生育保险的基数为职工工资总额, 基本医疗保险、失业保险职工个人缴费基数为本人工资, 为便于征缴可以以上一年度个人月平均工资为缴费基数。]
Question #	VAP-B1.1b
Subsection Name	OCCUPATIONAL SAFETY
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	Major Non-Conformance
Conclusion	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, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production buildings. [Management Rules on Completion Acceptance Filing for Building Constructions and Municipal Infrastructure, Engineering (2009), article 4, The construction unit should register with the construction administrative department of the local people's government at or above the county level where the project is located within 15 days from the date of the completion acceptance of the project and in accordance with the provisions of these measures. / 《房屋建筑和市政基础设施工程竣工验收备案管理办法》(2009), 第四条, 建设单位应当自工程竣工验收合格之日起15日内, 依照本办法规定, 向工程所在地的县级以上地方人民政府建设行政主管部门(以下简称备案机关)备案。]
Question #	VAP-B2.1b
Subsection Name	EMERGENCY PREPAREDNESS
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	Major Non-Conformance

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Conclusion	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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. [Interim Provisions on the Administration of Examination and Acceptance of Fire Protection Design of Construction Projects (2020), article 33, Registration and spot check system is implemented for other construction projects. If other construction projects fail to pass the spot check according to law, they should be stopped from use; article 34, Within five working days from the other construction projects pass the completion acceptance, the construction unit should report to the fire design examination and acceptance competent department for registration./ 《建设工程消防设计审查验收管理暂行规定》(2020), 第三十三条, 对其他建设工程实行备案抽查制度。其他建设工程经依法抽查不合格的, 应当停止使用。第三十四条, 其他建设工程竣工验收合格之日起五个工作日内, 建设单位应当报消防设计审查验收主管部门备案。]
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	Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. [Code of Design of Manufacturing Equipment Safety and Hygiene. Article 6.1.6, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices. / 《生产设备安全卫生设计总则》第6.1.6条, 以操作人员的操作位置所在平面为基准, 凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位, 都必须设置安全防护装置。]
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
Conclusion	Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. [Regulation for Safety of Dangerous Chemical Article 20, units that produce, store and use the dangerous chemical should install related safety facilities in workshop or warehouse (to monitor, ventilation, sun proof, air-condition, fire prevention, fire fighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely. 《危险化学品安全管理条例》第二十条, 生产、储存、使用危险化学品的, 应当根据危险化学品的种类、特性, 在车间、库房等作业场所设置相应的监测、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、消毒、中和、防潮、防雷、防静电、防腐、防渗漏、防护围堤或者隔离操作等安全设施、设备, 并按照国家标准和国家有关标准要求进行维护、保养, 保证符合安全运行要求。]

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 used
Rating	Conformance
Conclusion	Any type of forced, involuntary or exploitative prison, indentured, bonded (including debt bondage), trafficked or slave labor is not used.

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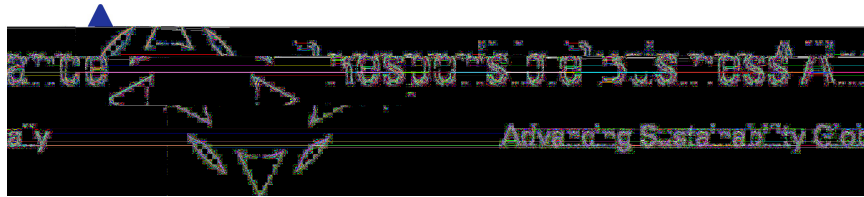
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Data points	<ul style="list-style-type: none"> * Record review: 70 out of 70 Personnel files reveal that a) no penalties are implemented b) all allowable fees and penalties are disclosed c) records on Fees are maintained d) no fees or penalties are implemented. * Record review: 70 out of 70 workers employment contracts reveal a) no type of forced, exploitative prison, indenture, bonded, trafficked or slave labor is used b) all allowable Fees and penalties are clearly stated. * Record review: 70 out of 70 payroll records in each month of the period June 2018 to May 2020 reveal a) no form of non-voluntary labor or fees b) no personal loans have a repayment maximum of 10 percent of the worker's monthly gross base wage, including interest, for no more than 6 monthly installments c) no education loan repayments do not exceed 10% of one year of gross base wages and no longer than 1 year per loan. * Record review: 70 out of 70 working hour records in each month of the period June 2018 to May 2020 reveal no form of non-voluntary labor. * Management interview: Ms. Valerie Xiao/Production Management System Engineer confirms and a) states no deposit or retention of salary is done b) confirm 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) confirm no prohibited Fees are paid by workers and allowable Fees are documented e) states no personal loans and no education loan is provided by the facility. * Worker interview: 70 out of 70 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 to confirm they paid no allowable Fees e) state no education loan and personal loan is provided by the facility. * Supporting evidence reference(s): N/A
Question #	VAP-A1.2
Question Text	Adequate and effective policy and procedures are established ensuring that any form of forced, bonded, involuntary or exploitative prison, trafficked or slave labor is not used.
Rating	Conformance
Conclusion	Adequate and effective policy and procedure are established ensuring that any form of forced, bonded, involuntary or exploitative prison, trafficked or slave labor is not used.
Data points	<ul style="list-style-type: none"> * Record review: Anti-forced labor management control procedure (Doc. No.: SHZ-SAP-04, Rev. A3, Issue date: May 8, 2020) states a) No personal loans of the worker's monthly gross base wage, including interest, for no more than 6 monthly installments b) no education loan is provided by the facility. * Record review: There is no foreign worker working in the facility. * Record review: There is no Labor Agents and Labor Contractors contracts in the facility. * Record review: Internal audit control procedure (Doc. No.: SHZ-SAP-15, Rev. A2, Issue date: May 8, 2020) states the method of monitoring of conformance with policy. * Record review: 12 out of 12 fee monitoring reports covering the period June 2018 to May 2020 demonstrate monitoring of conformance with policy. * Record review: There is no corrective action plan covering the period June 2018 to May 2020 because the facility does not detect any non-conformance. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states the detail of no forced, bonded, involuntary or exploitative prison, trafficked or slave labor policy and procedure b) confirm that Labor Agents and Contractors are not used c) details how they monitor adherence to the policy and what corrective action they have made if needed. * Worker interview: 70 out of 70 workers confirm what no forced, bonded, involuntary or exploitative prison, trafficked or slave labor means. * Supporting evidence reference(s): N/A
Question #	VAP-A1.3
Question Text	Terms of contract are provided in writing and in their native language prior to employment (in case of 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) of the key employment terms and conditions via employment letter/agreement/contract and explained verbally in their native language so workers understand what the contract states
Rating	Conformance
Conclusion	Terms of contract are provided in writing and in their native language prior to employment of the key employment terms and conditions via employment contract and explained verbally in their native language, so workers understand what the contract states. No foreign migrant worker is used in the facility.

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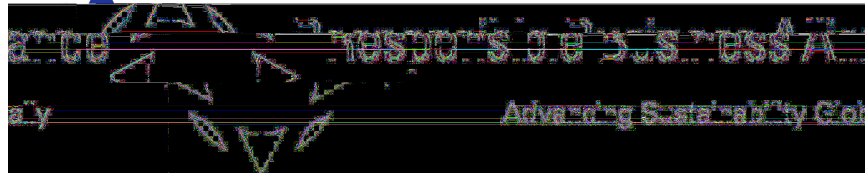
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Data points	<ul style="list-style-type: none"> * Record review: 70 out of 70 written employment contracts in workers' native language signed prior to the date on which the worker started a) all key employment terms and conditions in their native language a.a) Nature of work a.b) Working hours, Days off and holidays a.c) Leave entitlements a.d) Benefits a.e) What fees the worker will be charged and the amount 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 employment contracts state that workers can resign without penalty. * Record review: No employment contracts of migrant workers is provided for review because there is no migrant worker in this facility. * Record review: 12 out of 12 worker communication reports covering the period of June 2019 to May 2020 demonstrate that workers are informed prior to employment of the key employment terms and conditions either verbally or in writing in their native language. * Management interview: Ms. Valerie Xiao/Production Management System Engineer: a) states the details of the employment conditions for local workers and for migrant workers b) No foreign migrant worker is used in the facility c) details what, how and when the verbal explanation to workers of the key components of the employment conditions are delivered. * Worker interview: 70 out of 70 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. * Supporting evidence reference(s): N/A
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/labor agent/contractor
Data points	<ul style="list-style-type: none"> * Site observation: Workers: a) show where personal documents are kept b) demonstrate control over their identity documents. * Record review: Anti-forced labor management control procedure (Doc. No.: SHZ-SAP-04, Rev. A3, Issue date: May 8, 2020) reveals no government issued identification or personal documents originals are held or stored. * Record review: 70 out of 70 Personnel files reveal no workers' personal documentation originals. * Management interview: Ms. Valerie Xiao/Production Management System Engineer: a) states the details of the policy on not holding of worker's original documents b) states no personal documents are held by the auditee. * Worker interview: 70 out of 70 workers a) show their original personal documents b) state their personal documents are not kept by the auditee. * Supporting evidence reference(s): N/A
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"> * Site observation: Workers a) move freely when needed to access basic liberties (no systems for restriction in place such as toilet passes). 2) are free to leave the facility or dormitory when not engaged in work. * Record review: Anti-forced labor management control procedure (Doc. No.: SHZ-SAP-04, Rev. A3, Issue date: May 8, 2020) states the detail on freedom of movement and on freedom of movement implementation. * Management interview: Ms. Valerie Xiao/Production Management System Engineer: a) states how workers can move freely within the Auditee on all basic liberties and move to/from workplace and to/from dormitory when not engaged in work b) confirm the company implements non-coercive restriction systems. * Worker interview: 70 out of 70 workers a) state there are no restrictions on movement for basic liberties and to/from dormitory or in/out of the facility when not engaged in work b) confirm there is no usage of toilet pass, no time restriction. * Supporting evidence reference(s): N/A
CHILD LABOR AVOIDANCE	
Question #	VAP-A2.1
Question Text	Workers are not below the minimum age

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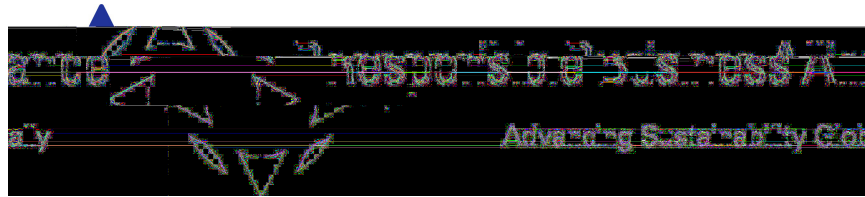
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Rating	Conformance
Conclusion	Workers are not below the minimum age, the youngest worker is 18 years old.
Data points	<ul style="list-style-type: none"> * Site observation: No workers on site appear to be under the minimum age. * Record review: 70 out of 70 personnel files reveal no workers on site are under the minimum age. The youngest worker is 18 years old. * Management interview: Ms. Valerie Xiao/Production Management System Engineer confirm the facility has not hired underage workers. * Worker interview: 70 out of 70 workers a) state no worker under the minimum age at the facility to their knowledge b) confirm the facility has not any underage employees to their knowledge. * Supporting evidence reference(s): N/A
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 directly. No workers are hired indirectly via labor agencies/contractors.
Data points	<ul style="list-style-type: none"> * Record review: Safety Child Labor and Juvenile Worker Protection Control Procedure (Doc. No.: SHZ-SAP-03, Rev. A3, Issue date: May 8, 2020) 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. It 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 into the facility. c) a process to assist underage children found working to provide for the welfare of the child. * Record review: 70 out of 70 personnel files reveal workers' identification card copies are maintained. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) details of the child labor prohibition policy b) explains the minimum age verification and documentation procedure c) confirm what is done when an underage worker is discovered. * Worker interview: 70 out of 70 workers: a) detail the child labor prohibition policy b) explain how their age was verified during the hiring process. * Supporting evidence reference(s): N/A
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	
WORKING HOURS	
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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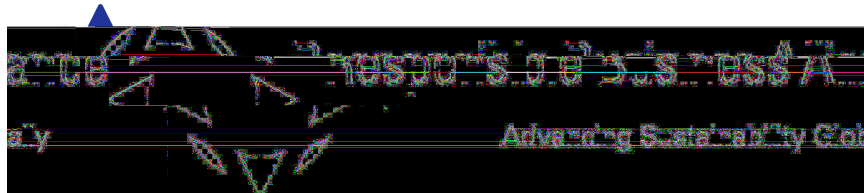
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<p>Conclusion</p>	<p>Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours.</p> <p>a) Between 72 h/workweek and 84 h/workweek: a.a) Average =1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) =0%</p> <p>c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours.</p> <p>d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours</p> <p>[PRC Labor Law article 41, effective from December 29, 2018, the employer 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. / 《中华人民共和国劳动法》第41条2018年12月29日实施。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>Data points</p>	<p>* Record review: 70 out of 70 working hour records covering each month of June 2019 (random), April 2020 (random) and May 2020 (random) demonstrate hours worked in a workweek over the last 12 months exceed 60 hours. The highest weekly working hours are 73.5 h/workweek. a) Between 72 h/workweek and 84 h/workweek: a.a) Average =1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 h/workweek a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) =0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours.</p> <p>* Record review: No government waiver/permit or alternative working hour system is obtained by the facility.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer confirms a) the maximum hours worked for June 2019 (random): 73.5 h/workweek b) the maximum hours worked for April 2020 (random): 60.5 h/workweek c) the maximum hours worked for May 2020 (random): 60 h/workweek d) the maximum monthly overtime exceeds 36 hours for June 2019 (random): 139.5 h/month e) the maximum monthly overtime exceeds 36 hours for April 2020 (random): 82.5 h/month f) the maximum monthly overtime exceeds 36 hours for May 2020 (random): 90.5 h/month h) the maximum daily overtime exceeds 3 hours for June 2019 (random): 4.5 h/day i) the maximum daily overtime exceeds 3 hours for April 2020 (random): 4.5 h/day j) the maximum daily overtime exceeds 3 hours for May 2020 (random): 4.5 h/day</p> <p>* Worker interview: 70 out of 70 workers confirm: a) the maximum hours worked for June 2019 (random): 73.5h/workweek b) the maximum hours worked for April 2020 (random): 60.5h/workweek c) the maximum hours worked for May 2020 (random): 60 h/workweek d) monthly overtime exceeds 36 hours, with a highest of 139.5 hours; Daily overtime working exceeds 3 hours, up to 4.5 hours.</p> <p>* Supporting evidence reference(s): RBA Working Hours Collection Template Protocol</p>
<p>Question #</p>	<p>VAP-A3.2</p>

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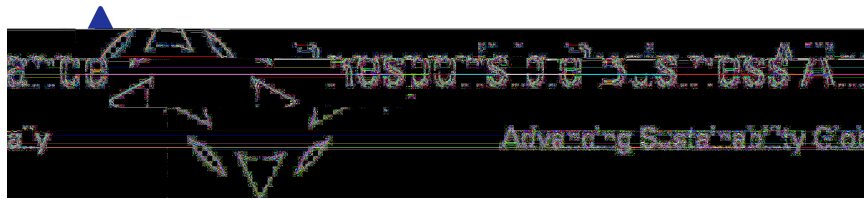
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Question Text	Workers receive at least one (1) day off every seven (7) days
Rating	Minor Non-Conformance
Conclusion	<p>Workers do not receive at least one day off every seven days. There is no obvious peak or non-peak month in the factory. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled. The longest consecutive working days are 22 days worked</p> <p>a) Between 12 and 24 consecutive days worked: a.a) Average = 1.9% with a highest of 22 consecutive days worked a.b) June 2019 (random month) = 6% with a highest of 22 consecutive days worked a.c) For April 2020 (random) = 0% a.d) For May 2020 (random) = 0%</p> <p>b) Between 7 and 12 consecutive days worked: b.a) Average =6.7% with a highest of 9 consecutive days worked b.b) June 2019 (random month) = 20% with a highest of 9 consecutive days worked b.c) April 2020 (random) = 0% b.d) May 2020 (random) = 0%</p> <p>[The Labor Law of the PRC article 38, effective from December 29, 2018, Employing units are to guarantee that employees have at least one day off a week. 《中华人民共和国劳动法》第38条, 2018年12月29日生效,用人单位应当保证劳动者每周至少休息一天。]</p>
Data points	<p>* Record review: 70 out of 70 working hour records covering each month of the period of June 2019 (random), April 2020 (random) and May 2020 (random) demonstrate that workers do not receive at least one day off every seven days. The longest consecutive working days are 22 days worked a) Between 12 and 24 consecutive days worked: a.a) Average = 1.9% with a highest of 22 consecutive days worked a.b) June 2019 (random month) = 6% with a highest of 22 consecutive days worked a.c) For April 2020 (random) = 0% a.d) For May 2020 (random) = 0% b) Between 7 and 12 consecutive days worked: b.a) Average =6.7% with a highest of 9 consecutive days worked b.b) June 2019 (random month) = 20% with a highest of 9 consecutive days worked b.c) April 2020 (random) = 0% b.d) May 2020 (random) = 0%</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer confirms: a) the maximum consecutive days worked for June 2019 (random): 22 consecutive days worked b) the maximum consecutive days worked for April 2020 (random): 6 consecutive days worked c) the maximum consecutive days worked for May 2020 (random): 6 consecutive days worked</p> <p>* Worker interview: 70 out of 70 workers confirm: a) the maximum consecutive days worked for June 2019 (random): 22 consecutive days worked b) the maximum consecutive days worked for April 2020 (random): 6 consecutive days worked c) the maximum consecutive days worked for May 2020 (random): 6 consecutive days worked</p> <p>* Supporting evidence reference(s): RBA Working Hours Collection Template Protocol</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	Major Non-Conformance
Conclusion	Adequate 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. However, the working hours control system are ineffective implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that major non-conformance in A3.1 and Minor non-conformance in A3.2 are detected.

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Data points	<ul style="list-style-type: none"> * Site observation: Fingerprint time recording devices are present and in good working condition. * Record review: Social Responsibility Manual (Doc. No.: SHZ-SAM-01, Rev. A3, Issue date: April 20, 2020) states the weekly working hours of the facility are not more than 60 and workers have one days off in every 7 days periods. * Record review: Attendance Management Work Standard (Doc. No.: SHZ-SAS-3A-01, Rev. A3, Issue date: May 8, 2020) states the working hours, overtime and days off. It states the accurate implementation mechanisms to a) accurately determine b) record c) manage d) control working hours including overtime and days off. * Record review: 70 out of 70 working time records covering each month of the period of June 2019 (random), April 2020 (random) and May 2020 (random) demonstrate time is recorded accurately and completely. * Record review: 2 out of 2 corrective action plans covering the period June 2019 to May 2020 reveal the non-conformance detected without corrective action implementation and progress against the corrective action. * Record review: 12 out of 12 preventative maintenance records covering the period of June 2019 to May 2020 demonstrate time recording devices are well maintained and in good working order. * Record review: 20 out of 20 leave records covering the period June 2019 (random), April 2020 (random) and May 2020 (random) confirm data found in A3.1 and A3.2. * Record review: 80 out of 80 production records covering the period June 2019 (random), April 2020 (random) and May 2020 (random) confirm data found in A3.1 and A3.2. * Record review: 70 out of 70 working hour records covering each month of the period of June 2019 (random), April 2020 (random) and May 2020 (random) reveal data found in A3.1 and A3.2. * Management interview: Ms. Valerie Xiao/Production Management System Engineer confirms the working hours control system are ineffective implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that workers' weekly working hours exceed 60 hours with a highest of 73.5 hours and, monthly overtime exceeds 36 hours with a highest of 139.5 hours. Daily overtime working exceeds 3 hours up to 4.5 hours. Workers do not receive at least one day off every seven days. There is no obvious peak or non-peak month in the factory. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled. Between 12 and 24 consecutive days worked: Average = 1.9% with a highest of 22. For June 2019 (random month) = 6% with a highest of 22. For April 2020 (random) = 0%. For May 2020 (random) = 0%. Between 7 and 12 consecutive days worked: Average = 6.7% with a highest of 12. For June 2019 (random month) = 20%, with a highest of 12; For April 2020 (random) = 0%. For May 2020 (random) = 0%. She a) details the tracking, implementation, monitoring and corrective actions b) explains how working hours are communicated and recorded c) Ensure the accuracy and maintenance of time recording device * Worker interview: 70 out of 70 workers 1) 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. They confirm their weekly working hours exceed 60 hours and, monthly overtime exceeds 36 hours. * Supporting evidence reference(s): N/A
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	Conformance
Conclusion	Workers are allowed mandated breaks, holidays and vacation days, including time off when ill or for maternity leave.
Data points	<ul style="list-style-type: none"> * Site observation: Workers take mandatory breaks which include at least one meal break per shift. * Record review: Leave Management Work Standard (Doc. No.: SHZ-SAS-3A-05, Rev. A3, Issue date: May 8, 2020) states sick leave, holidays, vacation, paternity and maternity leave and mandated meal and rest breaks and the detail of procedure to manage for sick leave, holidays, vacation, paternity and maternity leave and mandated meal and rest breaks. * Record review: 20 out of 20 leave records covering the period June 2019 to May 2020 demonstrate: a) actual leaves and holidays are recorded, securely kept and are accurate b) leave records are stored for 12 months c) leave records are consistent with the medical certificates. * Record review: 6 out of 6 medical certificates covering the period of June 2019 to May 2020 demonstrate consistency with the leave records for this period. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) details the policies and procedure for sick leave, holidays, vacation and paternity and maternity leave b) confirm the break provisions for workers. * Worker interview: 70 out of 70 workers: 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. * Supporting evidence reference(s): N/A
WAGES AND BENEFITS	
Question #	VAP-A4.1
Question Text	Wages for regular and overtime hours are correctly calculated and paid to all workers

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Rating	Conformance
Conclusion	Wages for regular and overtime hours are correctly calculated and paid to all workers.
Data points	<p>* Record review: Working Time and Wages Management procedure (Doc. No.: SHZ-SAP-13, Rev. B, Issue date: May 8, 2020) 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).</p> <p>* Record review: 70 out of 70 payroll records covering each month of the period June 2019 to May 2020 demonstrate wages and overtime are correctly calculated as per working time and days off records. All workers are paid at least RMB 2000 per month for regular working hours, which is higher than the local minimum wage standard of RMB1550 per month.</p> <p>* Record review: 70 out of 70 working hour records covering each month of the period June 2019 to May 2020 demonstrate wages and overtime are correctly calculated.</p> <p>* Record review: 20 out of 20 leave records covering the period June 2019 to May 2020 demonstrate wages and overtime are correctly calculated.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer 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. She confirms that wages for regular and overtime hours are correctly calculated and paid to all workers.</p> <p>* Worker interview: 70 out of 70 workers confirm they know the monthly wage calculation method through orientation training and annually refreshment training and receive their wages before the end of each month. If errors have occurred in their wages, facility will correct the error by next payroll period, and they have not found the error in the last 12 months.</p> <p>* Supporting evidence reference(s): N/A</p>
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	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.
Data points	<p>* Record review: 70 out of 70 payroll slips covering each month of the period of June 2019 to May 2020 demonstrate wages, benefits, and overtime are correctly calculated as per working time and days off records.</p> <p>* Record review: 12 out of 12 payroll payment records covering the period June 2019 to May 2020 demonstrate a) consistency with the pay roll slips and wages are paid timely b) accurate pay records are maintained for 12 months c) wages are paid directly to workers with no unauthorized deductions (including for disciplinary measures) in a timely manner d) recurring pay (including overtime) is not delayed more than two days after the agreed timing for payment e) no financial penalty for maternity or sick leave.</p> <p>* Record review: 4 out of 4 severance payment records covering the period June 2019 to May 2020 reveal the facility pays wages to resigned workers on the day when the labor relationship is terminated or dissolved.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer confirm a) wages of resigned workers are paid on the day when the labor relationship is terminated or dissolved and b) explains when and how wages are communicated to workers c) details what process is in place to correct wages if errors are reported.</p> <p>* Worker interview: 70 out of 70 workers/a) confirm the payment amounts what is stated on their pay slip b) explain how their wages are calculated c) detail what is the process if errors have occurred d) confirm no wage errors occurred and they have been correctly rectified by the next pay roll cycle e) state what deductions are made from their wages f) explain which employer contributions are required for them g) confirm they are paid timely.</p> <p>* Supporting evidence reference(s): N/A</p>
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.

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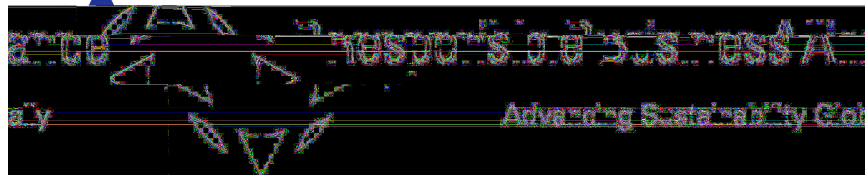
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Data points	<ul style="list-style-type: none"> * Record review: Administration Regulation (Doc. No.: Nil, Rev. A4, Issue date: July 1, 2019) a) prohibits disciplinary wage deductions b) includes "Pay equals time worked". * Record review: 10 out of 10 disciplinary records covering the period of June 2019 to May 2020 show no form of disciplinary wage deduction. * Record review: 70 out of 70 payroll slips covering each month of the period June 2019 to May 2020 demonstrate no wages deduction for disciplinary reasons. * Record review: 12 out of 12 payroll payment records covering the period of June 2019 to May 2020 demonstrate no wages deduction for disciplinary reasons. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states what disciplinary measures are applied b) confirm disciplinary measures do not include wage deductions. * Worker interview: 70 out of 70 workers a) state what disciplinary measures are applied b) confirm disciplinary measures do not include wage deductions. * Supporting evidence reference(s): N/A
Question #	VAP-A4.4a
Question Text	Are there withholdings for taxes or required contributions to worker insurance schemes?
Rating	Yes
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	Major Non-Conformance
Conclusion	<p>Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year. [The Notice about The Standardized Requirement of Social Insurance Contribution Base ([2006]60): effective date: November 15, 2006. In the principle, the worker in the unit should pay the endowment insurance based on him-self's average monthly wage of the previous year. The base for the unit to pay for medical insurance, unemployment insurance, industrial injury insurance, and maternity insurance are the workers' total wage of the previous year. For the individual contribution of medical insurance and unemployment insurance, the base is the worker's monthly salary, it is calculated based on average wage of last 12 months for convenience. 《劳动保障中心函〔2006〕60号》，生效时间：2006年11月15号，单位职工本人缴纳基本养老保险费的基数原则上以上一年度本人月平均工资为基础，参保单位缴纳基本医疗保险、失业保险、工伤保险、生育保险费的基数为职工工资总额，基本医疗保险、失业保险职工个人缴费基数为本人工资，为便于征缴可以以上一年度个人月平均工资为缴费基数。]</p>

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Data points	<ul style="list-style-type: none"> * Record review: 12 out of 12 contribution payroll calculation records covering the period June 2019 to May 2020 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) maternity insurance a.e) work-related injury insurance b) analysis by individual worker c) total per contribution type. * Record review: 12 out of 12 contribution payment records covering the period of June 2019 to May 2020 demonstrate for at least 12 months payments are made timely. The social insurance contributions base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year. * Record review: 70 out of 70 payroll slips covering each month of the period of June 2019 to May 2020 show all workers have participated in all five types of social insurances according to legal requirements. The social insurance contributions base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year. * Management interview: Ms. Valerie Xiao/Production Management System Engineer confirms the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year and: a) confirm which deduction are applied to worker wages b) explains how these are calculated c) details what system is in place to implement/monitor, communicate to worker d) states the process to ensure on time payment e) details the emergency actions taken if there are delays beyond their control. * Supporting evidence reference(s): N/A
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HUMANE TREATMENT

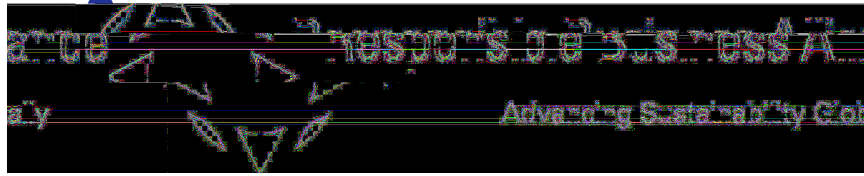
Question #	VAP-A5.1
Question Text	No evidence of sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation exists
Rating	Conformance
Conclusion	No evidence of sexual harassment or abuse, corporal punishment, mental or physical coercion, verbal abuse or intimidation exists.
Data points	<ul style="list-style-type: none"> * Site observation: No identification of possible instances of inhumane treatment. * Record review: 12 out of 12 grievance records covering the period of June 2019 to May 2020 do not show instances of inhumane treatment. * Record review: No negative case has happened, and no corrective action plan is needed. * Record review: 12 out of 12 disciplinary records covering the period of June 2019 to May 2020 do not show inhumane disciplinary measures. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) confirm no grievance or complaints have taken place regarding inhumane treatment b) No instances are reported. * Worker interview: 70 out of 70 workers: a) detail no grievance or complaints have taken place regarding inhumane treatment to their knowledge b) No instances are reported. * Supporting evidence reference(s): N/A

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 procedure on decent/humane working conditions and fair treatment of workers are established.
Data points	<ul style="list-style-type: none"> * Record review: Anti-sexual harassment, abuse, coercion management procedure (Doc. No.: SHZ-SAP-33, Rev. A1, Issue date: July 13, 2020) details humane treatment at the facility. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states the details of the humane treatment policies and procedure. * Worker interview: 70 out of 70 workers state the details of the humane treatment policies and procedure. * Supporting evidence reference(s): N/A

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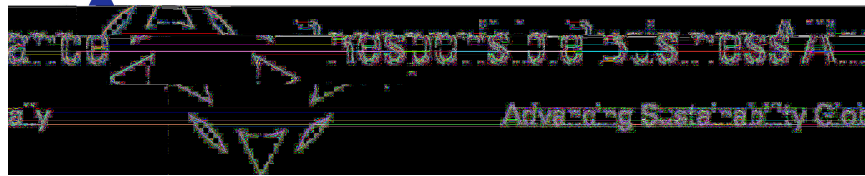
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Question #	VAP-A5.3
Question Text	Disciplinary actions are recorded, consistent with the procedures and reviewed by management
Rating	Conformance
Conclusion	Disciplinary actions are recorded, consistent with the procedure and reviewed by management.
Data points	<ul style="list-style-type: none"> * Record review: 12 out of 12 disciplinary records, covering the period of June 2019 to May 2020 demonstrate a) records are available for last 12 months b) disciplinary actions include signature or confirmation of worker c) review by management. * Record review: Administration Regulation (Doc. No.: Nil, Rev. A4, Issue date: July 1, 2019) states the detailed process how disciplinary actions are appealed. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states how disciplinary actions are recorded b) explains how disciplinary actions are communicated to workers c) details how appeals are handled. * Worker interview: 70 out of 70 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. * Supporting evidence reference(s): N/A
NON-DISCRIMINATION	
Question #	VAP-A6.1
Question Text	No evidence of discrimination
Rating	Conformance
Conclusion	There is no evidence of discrimination
Data points	<ul style="list-style-type: none"> * Site observation: No visible instances of discrimination * Record review: 2 out of 2 application questionnaires covering the period of June 2019 to May 2020 evaluate the candidate's fitness for the job only. * Record review: 2 out of 2 job advertisements covering the period of June 2019 to May 2020 confirm no discrimination. * Record review: 12 out of 12 hiring and termination records covering the period of June 2019 to May 2020 confirm the candidate's ability to perform the job's requirements only. * Record review: 5 out of 5 job descriptions covering the period of June 2019 to May 2020 focus solely on occupational qualifications, no personal characteristics are in place. * Record review: 70 out of 70 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. * Record review: 70 out of 70 payroll records covering each month of the period of June 2019 to May 2020 confirm no instances of discrimination. * Record review: 4 out of 4 promotion records covering the period of June 2019 to May 2020 confirm no instances of discrimination. * Record review: 12 out of 12 disciplinary records covering the period of June 2019 to May 2020 confirm no instances of discrimination. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states the facility treats its workers equally during recruitment, training, promotion and wage payment. There are no medical tests upon hiring process. No discrimination case is reported by employees before. * Worker interview: 70 out of 70 workers confirm that the workplace is free of discrimination, the facility does not arrange discrimination medical test upon hiring and they are not subjected to medical tests that could be used in a discriminatory way, and they receive same training or payment. The facility only assesses them based on their competence and work experience. * Supporting evidence reference(s): N/A
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 procedure that ban discrimination and harassment are in place.

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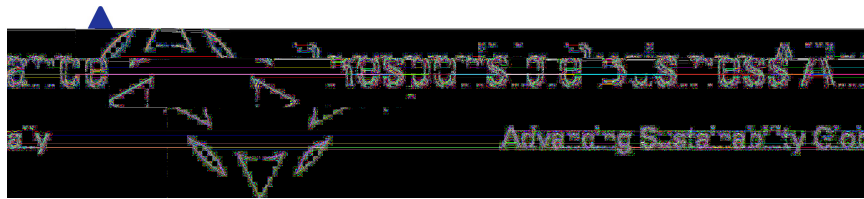
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Data points	<ul style="list-style-type: none"> * Record review: Anti-discrimination management control procedure (Doc. No.: SHZ-SAP-12, Rev. A2, Issue date: May 8, 2020) states a) a ban on all forms of discrimination. b) decisions in hiring, employing (such as compensation, promotion, access to training, or terminating workers are based solely on the candidate's ability to perform the job's requirements. c) periodical review to determine that there is no prohibited discrimination of c.a) hiring practices c.b) compensation records c.c) employee evaluation and promotion documents c.d) training records c.e) employee benefits policies and procedure c.f) disciplinary records. * Record review: 2 out of 2 discrimination practice review records covering the period of June 2019 to May 2020 show a periodic review as per Anti-discrimination management procedure is carried out. * Record review: No non-conformance is detected, and no corrective action plan is needed. * Management interview: Ms. Valerie Xiao/Production Management System Engineer confirm how the facility recruits, hires, promotes and terminates workers consistent with the Anti-discrimination management procedure. * Worker interview: 70 out of 70 workers detail the content of the of Anti-discrimination management procedure. * Supporting evidence reference(s): N/A
Question #	VAP-A6.3
Question Text	Reasonable accommodation for religious practices is provided
Rating	Conformance
Conclusion	Reasonable accommodation for religious practices is provided.
Data points	<ul style="list-style-type: none"> * Site observation: Clean and safe religious area are provided. * Record review: Religious faith control procedure (Doc. No.: SHZ-SAP-09, Rev. A3, Issue date: May 8, 2020) states a) the commitment to provide reasonable accommodation 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. It states a mechanism for receiving religious accommodation requests. * Record review: No religious accommodation requests covering the period of June 2019 to May 2020 is available because there is no request raised by the workers. * Record review: No CBA is in place. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) state how to request Reasonable Religious Accommodation b) confirm no requests they have received c) details the process how these requests are responded to if they receive any. * Worker interview: 70 out of 70 workers confirm they know how to request Reasonable Religious Accommodation. They have never made such a request. * Supporting evidence reference(s): N/A
FREEDOM OF ASSOCIATION	
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"> * 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. * Record review: Right of freedom of association and bargaining management control procedure (Doc. No.: SHZ-SAP-11, Rev. A2, Issue date: May 8, 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. * Record review: 4 out of 4 worker representative body meeting minutes covering the period of June 2019 to May 2020 demonstrate a) 12 months sources of funding and materials b) management contributions are limited to providing meeting space and meeting materials. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) state the detail of the Policy of Freedom of Association b) confirm a trade union(s) is present c) details what information is communicated to workers d) state how workers acknowledge understanding of the information provided e) confirm what they contribute to trade union meetings f) state how they ensure avoidance of influence or control. * Worker interview: 70 out of 70 workers (including 2 worker representatives): a) state the detail of the Policy of Freedom of Association b) confirm a trade union(s) is present c) states 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 a trade union and they enrolled voluntarily f) confirm there is no differentiation of treatment between union members and non-members g) detail the source of support h) state the amount contributed by the facility. * Supporting evidence reference(s): N/A

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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
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"> * Site observation: No signs of explicit prohibition of the right of peaceful assembly. * Record review: Right of freedom of association and bargaining management control procedure (Doc. No.: SHZ-SAP-11, Rev. A2, Issue date: May 8, 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) to refrain from doing so. * Record review: 4 out of 4 worker representatives meeting minutes covering the period of June 2019 to May 2020 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) respect the right of workers to refrain from doing so d) no interference with, restrain, or coerce workers in the exercise of their right. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states the details of the policies/procedure on peaceful assembly b) confirm workers have not individually or collectively raised concerns or ideas in the past. * Worker interview: 70 out of 70 workers (including 2 worker representatives): a) state the details of the policies/procedure on peaceful assembly b) confirm workers have not individually or collectively raised concerns or ideas in the past. * Supporting evidence reference(s): N/A
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 or worker representatives and other workers exists.

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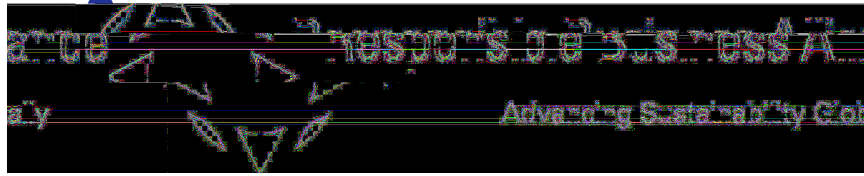
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Data points	<ul style="list-style-type: none"> * Site observation: No evident presence of a prohibition of association with a trade union. * Record review: 4 out of 4 Worker representatives body meeting minutes covering the period of June 2019 to May 2020 reveals no evidence that the facility: a) dismisses b) disciplines c) explicitly threatens workers in order to c.a) Encourage 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. * Record review: 12 out of 12 grievance records covering the period of June 2019 to May 2020 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. * Record review: 70 out of 70 payroll records covering each month of the period of June 2019 to May 2020 confirm that trade union employees are paid the same as other workers in similar job functions. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states no case of trade union discrimination has been reported; b) details the process how the parties resolved such case of trade union discrimination situation. * Worker interview: 70 out of 70 workers (including 2 worker representatives): 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 c) detail the process how the parties resolved such case of trade union discrimination situation. * Supporting evidence reference(s): N/A
LABOR PROVISION GOOD PRACTICES	
Question #	VAP-A8.1a
Question Text	Are there Labor provision good practices?
Rating	No
Conclusion	
Data points	
B) Health & Safety	
OCCUPATIONAL SAFETY	
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	Major Non-Conformance
Conclusion	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, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production buildings. [Management Rules on Completion Acceptance Filing for Building Constructions and Municipal Infrastructure, Engineering (2009), article 4, The construction unit should register with the construction administrative department of the local people's government at or above the county level where the project is located within 15 days from the date of the completion acceptance of the project and in accordance with the provisions of these measures./《房屋建筑和市政基础设施工程竣工验收备案管理办法》(2009).第四条,建设单位应当自工程竣工验收合格之日起15日内,依照本办法规定,向工程所在地的县级以上地方人民政府建设行政主管部门(以下简称备案机关)备案。]

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<p>Data points</p>	<ul style="list-style-type: none"> * Site observation: License related to special equipment including cargo lifts, pressure vessels and forklifts are placed at the working area. * Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) states the documented process to ensure permits are renewed before current permits expire. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. It does not include the status of the structure safety approval for 1 block of 2-storey and 1 block of 7-storey production buildings. * Record review: 5 out of 5 structure safety approvals (No Document No, Issue date: November 21, 2018) for two 3-storey and one 7-storey production buildings, one 3-storey warehouse building, one 6-storey and one 9-storey dormitory buildings are provided for review. No structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production buildings. * Record review: The Production Safety Assessment Report (Document No: ZWGDHZ201908075, Issue date: November 13, 2019) are provided for review. * Record review: 2 out of 2 Lightning protection system testing reports (One sample, Document No: Yueleijian[2019]YFLK-4-0040, issue date: July 30, 2019) indicate that the lightning protection devices of all buildings in the factory are tested and the results are acceptable. * Record review: 4 out of 4 drinking water testing reports covering the period of July 2019 to June 2020 demonstrate conformance with legal requirements and no contaminant risk for workers. * Record review: Radiation safety certificate (Document No: Yuehuanfuzheng[L0121], valid period: May 26, 2020 to December 20, 2022) is valid and provided for review. * Record review: The Hydrogen cyanide gas detector calibration report (No Document No, Issued date: August 1, 2019) demonstrates conformance with legal requirements. * Record review: 2 out of 2 insulating tools testing reports (Doc. No: Nil., Valid period: July 6, 2020 to July 6, 2021) are valid and provided for review. * Record review: 109 out of 109 Special equipment registration certificates (Elevator registration Doc. No: TiyueLKB700, Issue date: July 8, 2015) are provided for review. * Record review: 109 out of 109 special equipment inspection reports (Elevator report Doc. No: LTD-L02023216, valid period: June 8, 2020 to June 8, 2021) are provided for review. * Record review: 35 out of 35 special-appliance operator certificates (Forklift operator certificate No:422801199109174217, valid period: September 26, 2017 to September 26, 2021) are valid and provided for review. * Record review: 45 out of 45 electrician licenses (Doc. No: 112211010940929253X., valid period: January 21, 2019 to January 21, 2025) are valid and provided for review. * Record review: 102 out of 102 X-ray operator certificates (Doc. No: Nil., valid date: Nil.) are valid and provided for review. * Management interview: Ms. Li Bo / Safety Engineer confirms that no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production buildings. 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. * Supporting evidence reference(s): N/A
<p>Question #</p>	<p>VAP-B1.2</p>
<p>Question Text</p>	<p>Potential for worker exposure to safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are controlled through proper design, engineering and administrative controls and safe work procedure</p>
<p>Rating</p>	<p>Conformance</p>
<p>Conclusion</p>	<p>Potential for worker exposure to chemical, electrical and other energy sources, fire, vehicles, and fall hazards are controlled through proper design, engineering and administrative controls and safe work procedures.</p>

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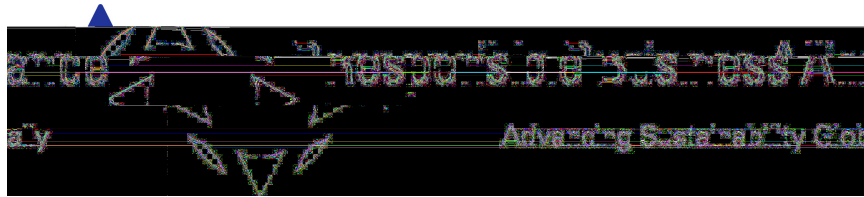
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Data points	<p>* Site observation: a) Engineering controls are used where appropriate b) Buildings do not show significant cracks or unsupported structures, walls, passages, mezzanines c) confined spaces are identified with proper labels in the site d) Chemicals are adequately and effectively d.a) categorized d.b) handled d.c) stored d.d) moved within the facility d.e) controlled d.f) access to hazardous substances is controlled d.g) 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> <p>* Record review: Safety Production Management Regulation (Doc. No: SHZ-EAW-12, Rev. A1, Issue date: April 21, 2020) states a) the details of safe work practices where engineering controls are not feasible or do not completely control the hazard b) confined spaces hazards are evaluated before workers are allowed to enter c) a hot work permit system for welding, cutting and brazing d) a daily safety inspection or prior to each use for all industrial powered vehicles e) electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards f) 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: 3 out of 3 confined space entry evaluations covering the period of July 2019 to June 2020 show confined spaces hazards are evaluated before workers are allowed to enter.</p> <p>* Record review: 2 out of 2 hot work permit covering the period of July 2019 to June 2020 show hot work permit system is in place for welding, cutting and brazing.</p> <p>* Record review: 12 out of 12 safety inspection records of industrial powered vehicles covering the period of July 2019 to June 2020 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 of July 2019 to June 2020 show electrical installations and wiring are regularly inspected and maintained to prevent electrical shock hazards.</p> <p>* Record review: 4 out of 4 lockout/tagout records covering the period of July 2019 to June 2020 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: 12 out of 12 safety program review records covering the period of July 2019 to June 2020 show a periodic program review was carried out.</p> <p>* Record review: 12 out of 12 corrective action plans covering the period July 2019 to June 2020 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: Ms. Li Bo / Safety Engineer states which a) methods, b) controls, c) procedures they have in place to minimize worker exposure to occupational safety.</p> <p>* Worker interview: 70 out of 70 workers state which a) 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): N/A</p>
Question #	VAP-B1.3a
Question Text	Is PPE required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B1.3b
Question Text	Appropriate Personal Protective Equipment (PPE) is consistently and correctly used where required to control safety hazards and worker exposure
Rating	Conformance
Conclusion	Appropriate Personal Protective Equipment (PPE) is consistently and correctly used where required to control safety hazards and worker exposure.

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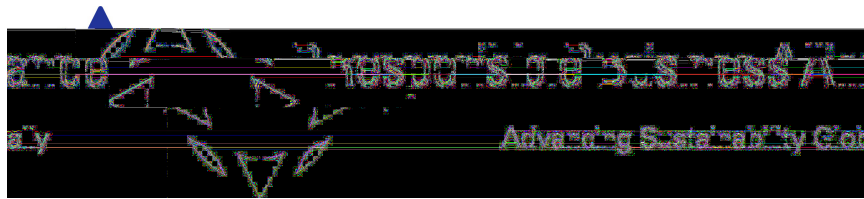
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Data points	<p>* Site observation: a) PPE selection is appropriate for the given hazard b) PPE requirements are communicated to employees via posted signs c) PPE is worn by all affected people either performing those tasks or in the areas that require PPE d) Workers are performing tasks that require PPE according to PPE procedure requirements e) PPE is available f) PPE is in good and working condition g) PPE is appropriately stored and accessible.</p> <p>* Record review: Labor Protection and Personal Protective Equipment Management Regulation (Document No. SHZ-EAW-12-No.6, Rev. A1, issue date: April 21, 2020) 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: 2 out of 2 PPE evaluation records covering the period of July 2019 to June 2020 show PPE adequacy evaluation records and aligns with Labor Protection and Personal Protective Equipment Management Regulation.</p> <p>* Record review: 12 out of 12 PPE replacement records covering the period of July 2019 to June 2020 show Labor Protection and Personal Protective Equipment Management Regulation is adequately implemented.</p> <p>* Record review: 2 out of 2 new PPE inventory logs covering the period of July 2019 to June 2020 show new PPE is available and requested when needed.</p> <p>* Record review: 2 out of 2 Job specific PPE matrix covering the period of July 2019 to June 2020 are 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 of July 2019 to June 2020 demonstrate fit tests for respiratory protection equipment are performed as per Labor Protection and Personal Protective Equipment Management Regulation.</p> <p>* Management interview: Ms. L. Bo, Safety Engineer states a) what PPE is required for which areas, b) details what procedures are place, b.a) to ensure PPE is appropriate to work hazards, b.b) appropriately utilized by all affected personnel.</p> <p>* Worker interview: 70 out of 70 workers state what PPE is required in the areas they work in, b) explain how their PPE is obtained and ensured to be safe/valid.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-B1.4a
Question Text	Are there any female workers?
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.

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Data points	<p>* Site observation: a) Pregnant workers are not working in job which has a hazard to the pregnant worker and her child. b) Reasonable accommodation for nursing mothers are in place.</p> <p>* Record review: Pregnant Woman and Nursing Mother Health & Safety Risk Identification Management Procedure (Document No: SHZ-SAS-3A-09, Rev. A3., issue date: May 8, 2020) states the commitment to minimize the Health & Safety impact on pregnant woman and nursing mothers. It 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. It states the procedure to a) provide reasonable break time for a worker to express breast milk for her nursing child for one year after the child's birth, b) each time such worker has need to express the milk, c) provide a place c.a) other than a bathroom, c.b) shielded from view, c.c) free from intrusion from coworkers and the public.</p> <p>* Record review: 2 out of 2 personnel files reveal specific to worker pre- and post-natal risk assessment and actions taken in line with Pregnant Woman and Nursing Mother Health & Safety Risk Identification Management Procedure.</p> <p>* Record review: 2 out of 2 risk assessment reports covering the period of July 2019 to June 2020 demonstrate risks for pregnant woman, nursing mother and actions taken.</p> <p>* Management interview: Mr. Li Bo / Safety Engineer a) states the detail of the general policy on minimize the Health & 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: 70 out of 70 workers state there are/have been pregnant workers to their knowledge, b) explain what actions management took for these workers, c) confirm the reasonable accommodations provided for nursing mothers.</p> <p>* Supporting evidence reference(s): N/A</p>
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EMERGENCY PREPAREDNESS	
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Question #	VAP-B2.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	

EMERGENCY PREPAREDNESS	
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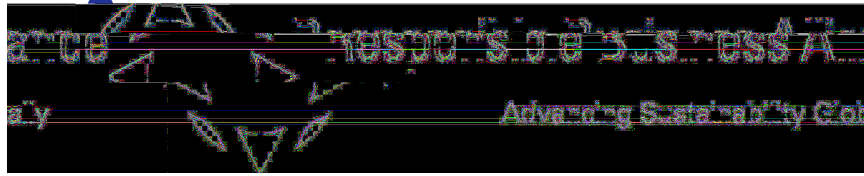
Question #	VAP-B2.1b
Question Text	All required permits, licenses and inspection/testing reports for fire safety response equipment (including fire suppression equipment) and emergency preparedness are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Major Non-Conformance

Conclusion	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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. [Interim Provisions on the Administration of Examination and Acceptance of Fire Protection Design of Construction Projects (2020), article 33, Registration and spot check system is implemented for other construction projects. If other construction projects fail to pass the spot check according to law, they should be stopped from use; article 34, Within five working days from the other construction projects pass the completion acceptance, the construction unit should report to the fire design examination and acceptance competent department for registration./ 《建设工程消防设计审查验收管理暂行规定》(2020), 第三十三条, 对其他建设工程实行备案抽查制度。其他建设工程经依法抽查不合格的, 应当停止使用。第三十四条, 其他建设工程竣工验收合格之日起五个工作日内, 建设单位应当报消防设计审查验收主管部门备案。]
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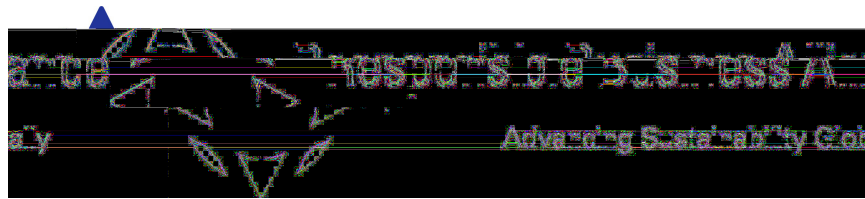
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Data points	<ul style="list-style-type: none"> * Site observation: Posting of emergency numbers and procedures are appropriately displayed. * Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) states the documented process to ensure permits are renewed before current permits expire. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. It does not include the status of the fire safety acceptance approval for 1 block of 2-storey production building. * Record review: 5 out of 5 fire safety approvals (one sample, Document No: Huiyanggongxiaoyanzi[2016]No. 0083, Issue date: August 22, 2016) for two 3-storey and two 7-storey production buildings, one 3-storey warehouse building, one 6-storey and one 9-storey dormitory buildings are provided for review. No fire safety acceptance approval is obtained for 1 block of 2-storey production building. * Record review: 10 out of 10 fire control room operator certificates (One sample, Doc. No: 1436003008511499, Issue date: November 15, 2014) are valid and provided for review. * Record review: Firefighting facilities annual testing report (Doc. No: Yuexiaojian(79553058-1)[2019]No. 16118, Issue date: September 5, 2019) is provided for review. * Management interview: Ms. Li Bo / Safety Engineer confirms that no fire safety acceptance approval is obtained for 1 block of 2-storey production building, 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. * Supporting evidence reference(s): N/A
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"> * Site observation: a) Automatic heat and smoke detection is not required by applicable law/insurance and not in place b) All buildings have a manual fire alarm and notification system c) fire alarm control system is free of trouble e) fire alarm manual call-points are provided at or along egress routes/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. * Record review: Fire Safety Management Regulation (Document No. SHZ-EAW-22 Chapter 2-No.1; Rev. A), issue date: April 21, 2020) describes the process and schedule for a) portable fire extinguishers, b) alarm and notification system, to be on a regular basis, as required by insurance company or common practice, c) inspected, d) tested, e) maintained. * Record review: 12 out of 12 portable fire fighting equipment inspection records covering the period of July 2019 to June 2020 demonstrate the inspection frequency is monthly. * Record review: 12 out of 12 alarm inspection records covering the period of July 2019 to June 2020 demonstrate the inspection frequency is not less than the required/recommended by the manufacturer, local code or insurance company frequency. * Record review: 12 out of 12 fire safety equipment maintenance records covering the period of July 2019 to June 2020 demonstrate preventative maintenance is carried out on all relevant fire safety equipment. * Management interview: Ms. Li Bo / Safety Engineer 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) maintained. * Worker interview: 70 out of 70 workers state where are the nearest a) fire extinguisher, b) hose station, c) fire alarm call-points. * Supporting evidence reference(s): N/A
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: Environmental Factors and Hazard Sources Identification Assessment Management Procedure (Document No.: SHZ-EQP-05, Rev. A4, issued date: May 20, 2020.) 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 response plan (ERP) (Document No. Nil, Rev. Nil, issued date: Nil.) states the current emergency response plans (ERP): a) business continuity plan, b) business resumption plan, c) reflecting the risk assessment, d) notification of outside emergency services, 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: Risk and Opportunity Identification Assessment Form (Document No: SHZ-EQP-11-01B, Issue date: Nil.) 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: The post-emergency plan (Document No. Nil., Issue date: April 22, 2020) demonstrates 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: Ms. Li Bo / Safety Engineer 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: 70 out of 70 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): N/A</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	Conformance
Conclusion	Effective emergency exit access, exits, and exit discharge are adequate in number and location, readily accessible, and properly maintained.
Data points	<p>* Site observation: a) an adequate number of effective exit routes from every 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/parking lot, and do not discharge to an enclosed/gated/locked 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 (>50) or hazardous areas open outward h) All 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/aisles, 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 required to 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.</p> <p>* Record review: Fire Safety Management Regulation (Document No. SHZ-EAW-12-Chapter 2-No.1, Rev. A1, issue date: April 21, 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 of July 2019 to June 2020 demonstrate: a) emergency support facilities (emergency lighting, emergency exit signs, evacuation paths, exit enclosures) are maintained, b) are inspected as per insurance requirements, or local practice.</p> <p>* Management interview: Ms. Li Bo / Safety Engineer a) details the emergency support facilities in place, b) explains how these are inspected and recorded.</p> <p>* Worker interview: 70 out of 70 workers a) explain the emergency support facilities, b) identify 2 exits nearest to them.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-B2.5

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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	<ul style="list-style-type: none"> * Record review: 6 out of 6 ERP drill evaluation reports covering the period of July 2017 to June 2020 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. * Management interview: Ms. Li Bo / Safety Engineer a) states when the previous drill was held, b) details all corrective actions from the drill have been completed or are on track. * Worker interview: 70 out of 70 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). * Supporting evidence reference(s): N/A
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	<ul style="list-style-type: none"> * 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 hard hat, and cubicle signage which identify emergency response team personnel are used. * Record review: ERT assignment Form (Document No. Nil. Issue date: Nil.) 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. * Record review: There is no qualification requirement of ERT members as per laws and regulations. * Record review: Fire Safety Management Regulation (Document No. SHZ-EAW-12-Chapter 2- No. 1, Rev. A1, issue date: April 21, 2020) states a) the requirement for emergency responders to be trained on an annual basis, b) training is dependent on responsibilities during an emergency. * Record review: ERT training material (Document No. Nil., Issue date: July 4, 2020) demonstrates conformance with Fire Safety Management Regulation. * Record review: 28 out of 28 ERT member personnel files demonstrate the necessary training records are a) available b) accurate. * Management interview: Ms. Li Bo / Safety Engineer a) details what training is required for emergency responders, b) confirms when the last training was held. * Worker interview: 15 out of 15 ERT members in dayshift a) confirm they are trained on an annual basis, b) State when they were last trained and on which topic, c) Explain their role and function during emergency situations. * Supporting evidence reference(s): N/A
OCCUPATIONAL INJURY AND ILLNESS	
Question #	VAP-B3.1a
Question Text	Are permits, licenses, approvals, registrations, or testing reports required?
Rating	Yes
Conclusion	
Data points	

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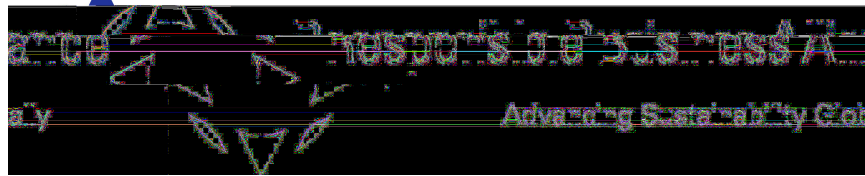
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Question #	VAP-B3.1b
Question Text	All required permits, programs, licenses, and testing reports for occupational injury and illness are in place and a process is implemented to ensure permits and licenses are up to date at all times
Rating	Conformance
Conclusion	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.
Data points	<ul style="list-style-type: none"> * Site observation: Required postings are a) current, b) located in public view. * Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) states the documented process to ensure permits are renewed before current permits expire. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. * Record review: 6 out of 6 Occupational disease hazardous factor monitoring report (One sample, Doc. No: XFB2020CR-10335, Issue date: April 14, 2020) is provided for review. * Management interview: Ms. Li Bo / Safety Engineer a) states which occupational safety permits are required b) details what testing was done c) confirms which department is in charge of the license/permit, frequency to renew or apply. * Supporting evidence reference(s): N/A
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
Data points	<ul style="list-style-type: none"> * Record review: Production Safety Incident Management Regulation (Document No. SHZ-BAW-12-No.7, Rev. 1, Issue date: April 21, 2020) 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. * Record review: 21 out of 21 occupational injury and illness data records covering the period of July 2017 to June 2020 demonstrate a) occupational Injury and illness data are available, b) for last 3 years, c) includes surveillance data. * Record review: 21 out of 21 occupational injury and illness investigation reports covering the period of July 2017 to June 2020 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. * Record review: Injury and accident trends analysis report (Document No. Nil, Issue date: June 2020) states a) the detail of the occupational Injury and illness trends for each year, b) corrective actions are identified. * Management interview: Ms. Li Bo / Safety Engineer 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. * Worker interview: 70 out of 70 workers a) confirm investigations are performed after an accident to their knowledge, b) state changes to the job/workstation/area is made and communicated to affected workers after an accident, c) confirm they are aware of job-related/legal required medical surveillance practices. * Supporting evidence reference(s): N/A
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

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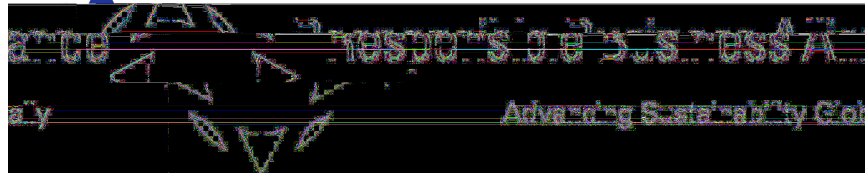
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Conclusion	An effective first aid process and adequate number of trained first responders are available to provide initial medical treatment for injured or ill workers is in place.
Data points	<ul style="list-style-type: none"> * Site observation: a) First Aid responders are easily identifiable by badges, colored attire, office/work area signage, b) the occupational medical clinic is adequately staffed and supplied to respond to injuries, c) alternative resources such as outside medical services are communicated to employees * Record review: Emergency Medical Assistance Management Procedure (Document No. SHZ-EAW-12-No.39, Rev. A1, issue date: April 21, 2020) states a) the detail of effective first response indicating severity of medical emergency response (first aid, infirmary, local external hospital) b) a team of trained and certified first responders covering every shift. * Record review: Medical Clinic Operations Log (Doc. No: Nil, Rev. Nil, Issue date: July 2020) reveals the onsite emergency occupational medical clinic log is available and up to date. * Record review: First Aid Kit Management Procedure (Document No. SHZ-EAW-12-No.39, Rev. A1, issue date: April 21, 2020) states: the detailed process and supplies for the onsite occupational medical clinic. * Management interview: Ms. Li Bo / Safety Engineer 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. * Worker interview: 70 out of 70 workers (including 5 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 where the infirmary is and when they can access it d) state what to do when a medical emergency is severe (first responders only). * Supporting evidence reference(s): N/A
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 monthly basis.
Data points	<ul style="list-style-type: none"> * Site observation: a) appropriate and completely stocked places, assigned 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. * Record review: First Aid Kit Management Procedure (Document No. SHZ-EAW-12-No.39, Rev. A1, issue date: April 21, 2020) states a) the details of 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 monthly for all inspections. * Record review: 12 out of 12 first response equipment inspection lists covering the period of July 2019 to June 2020 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. * Management interview: Ms. Li Bo / Safety Engineer 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. * Worker interview: 70 out of 70 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. * Supporting evidence reference(s): N/A
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	Conformance

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Conclusion	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.
Data points	<ul style="list-style-type: none"> * Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) states the documented process to ensure permits are renewed before current permits expire. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. * Record review: Occupational Disease Hazard Pre-assessment Report (Doc. No: GDAB.ZW[2019]-YP012, Issue date: September 9, 2019) is provided for review. * Record review: Occupational Disease Protection Facility Design Report (Doc. No: GDAB.ZW[2019]-ZP016, Issue date: October 22, 2019) is provided for review. * Record review: Occupational Disease Hazard Assessment of Operation Control Report (Doc. No: GDAB.ZW[2020]-KP003, Issue date: March 2, 2020) is provided for review. * Record review: Occupational disease hazards registration (Doc No.: 441303202021479. Issue date: April 14, 2020) is provided for review. * Record review: 6 out of 6 Occupational disease hazardous factor monitoring report (One sample, Doc. No: XFB2020CR-10335, Issue date: April 14, 2020) is provided for review. * Management interview: Ms. Li Bo / Safety Engineer a) state which industrial hygiene 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. * Supporting evidence reference(s): N/A
Question #	VAP-B4.2
Question Text	Appropriate controls according to the hierarchy of controls for worker exposures to chemical, biological and physical agents are implemented. Potential hazards are eliminated or controlled through proper design, engineering and administrative controls.
Rating	Conformance
Conclusion	Appropriate controls according to the hierarchy of controls for worker exposures to chemical, biological and physical agents are implemented. Potential hazards are eliminated or controlled through proper design, engineering and administrative controls.
Data points	<ul style="list-style-type: none"> * Site observation: Adequate controls to reduce or eliminate worker exposure to chemical and physical agents are in place and effective including: a) Proper design (elimination and/or substitution), b) Engineering controls, c) Administrative controls, d) Adequate and effective PPE, 2) During normal working hours, workplace is free from obvious odor, visible fume, dust, and other conditions leading to potential unhealthy feelings. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil, Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. * Record review: Occupational Disease Hazards Identification and Monitoring Regulation (Doc. No: SHZ-EAW-12-No.33, Rev. A1, Issue date: April 21, 2020) states: a) a risk assessment with a.a) associated industrial hygiene sampling and testing b) to identify and assess the potential hazards of b.a) chemical b.b) biological b.c) physical agents. c) 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 s introduced into the work environment, e.b) when an existing process is changed that may trigger an employee health risk. * Record review: Industrial Hygiene Risk Assessment Record (Doc. No: Nil, Issue date: March 1, 2020) demonstrates consistency with Occupational Disease Hazards Identification and Monitoring Regulation. * Record review: Occupational Disease Protection Facility Management Regulation (Doc. No: SHZ-EAW-12-No. 34, Rev. A1, Issue date: April 21, 2020) 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. * Record review: Effectiveness Evaluation Report (Doc. No: Nil., Issue date: December 2019) demonstrates a) the evaluations occur regularly as per Hazards Assessment 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. * Record review: 3892 out of 3892 medical surveillance records covering the period of July 2017 to June 2020 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. * Management interview: Ms. Li Bo / Safety Engineer 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/minimized. * Worker interview: 70 out of 70 workers a) state what controls management has implemented on their job/position/area to minimize the risk of a.a) chemical a.b) biological a.c) physical agents. * Supporting evidence reference(s): N/A

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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.
Data points	<p>* Site observation: a) Adequate controls to reduce or eliminate physical demanding work: a.a) are in place and effective, a.b) including proper design, engineering controls and administrative controls.</p> <p>* Record review: Ergonomic and Ergonomic Evaluation Management Procedure (Document No.: SHZ-EWP-05, Rev. A3., issue date: June 17, 2020) states a) a risk assessment b) to identify and assess the potential hazards of physical demanding work, c) the requirement the risk assessment is updated when a Significant Change occurs. It states the details of the program: a) to control the identified potential hazards to physical 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.</p> <p>* Record review: Ergonomic Assessment Document (Doc. No. Nil., Issue date: April 22, 2020) demonstrates consistency with Ergonomic and Ergonomic Evaluation Management Procedure.</p> <p>* Record review: 2 out of 2 grievance reports covering the period of July 2019 to June 2020 demonstrate the facility implements an early reporting of discomfort mechanism as per Ergonomic and Ergonomic Evaluation Management Procedure.</p> <p>* Management interview: Ms. Li Bo (Safety Engineer) a) states how the facility analyzes physical demanding work, b) confirms the risks are identified, c) details what controls are in place to minimize these risks.</p> <p>* Worker interview: 70 out of 70 workers a) state adequate efforts by the facility to control ergonomic hazards are made, b) confirm they are pain free, c) detail what was or is being done to reduce any physical pain now or in the past they are /were experiencing.</p> <p>* Supporting evidence reference(s): N/A</p>
MACHINE SAFEGUARDING	
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	Major Non-Conformance

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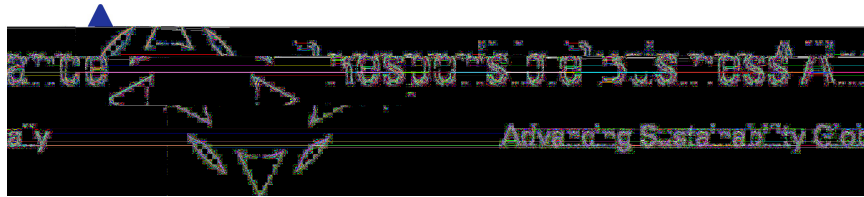
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Conclusion	Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. [Code of Design of Manufacturing Equipment Safety and Hygiene. Article 6.1.6, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices. / 《生产设备安全卫生设计总则》第6.1.6条：以操作人员操作位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。]
Data points	<ul style="list-style-type: none"> * Site observation: a) All machines have adequate emergency stops b) All workers operate machine safely c) No protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1 * Record review: Mechanical Equipment Safety Management Procedure (Doc. No: SHZ-EAP-06, Rev. A2, Issue date: June 15, 2020) 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. It 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. * Record review: 3 out of 3 machinery safety risk assessments covering the period of July 2017 to June 2020 reveal that the risk of no protective cover for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1 is not identified * Record review: 12 out of 12 preventive maintenance records covering the period of July 2019 to June 2020 reveal that no preventive maintenance is conducted for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. * Record review: 3 out of 3 work instructions covering the period of July 2019 to June 2020 demonstrate a) availability within proximity of the machine, b) in a language understood by the worker. * Management interview: Ms. Li Bo / Safety Engineer confirms that no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. a) details the overview of the machine risk assessment and safeguarding program, b) confirms how the facility ensures workers understand the safe use of the machine they operate. * Worker interview: 70 out of 70 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. * Worker interview: 2 out of 2 workers who are responsible for the laser thickness gauge machines in lamination workshop on 1/F of production building #1 states that no protective cover is available for the rotational axis of 5 laser thickness gauge machines. * Supporting evidence reference(s): B6.2b.jpg
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	Conformance
Conclusion	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.

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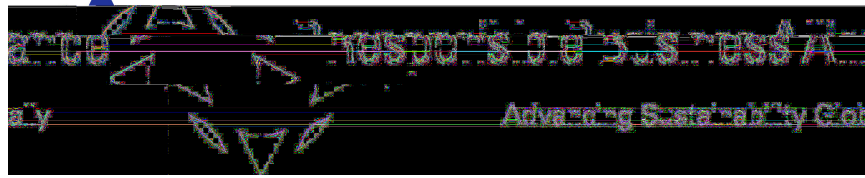
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Data points	<ul style="list-style-type: none"> * Site observation: Valid hygiene permit is placed on site. * Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) states the documented process to ensure permits are renewed before current permits expire. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when permits, licenses and tests reports expire and when the renewal process must be initiated as well as when it was initiated. * Record review: 2 out of 2 Food Service Permits (Doc. No: Nil., Issue date: Nil.) of the catering service vendors are provided for review. * Record review: 94 out of 94 catering service workers' health certificates (One sample, Document No. Nil. Issue date: October 15, 2019.) are provided for review. * Record review: 9 out of 9 food sample testing reports covering the period from July 2019 to June 2020 are provided for review. * Management interview: Ms. Li Bo / EHS Engineer a) states which health & safety permits are required related to food, sanitation and housing, 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. * Supporting evidence reference(s): N/A
Question #	VAP-B7.2a
Question Text	Are there dormitories, bathrooms, employee spaces?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-B7.2b
Question Text	Dormitories, bathrooms, employee spaces are clean, safe and well maintained and meet international housing standards
Rating	Conformance
Conclusion	Dormitories, bathrooms, employee spaces are clean, safe and well maintained and meet international housing standards.
Data points	<ul style="list-style-type: none"> * Site observation: a) Dormitory and sanitary facilities are a.a) clean a.b) properly maintained b) Stairwells are b.a) clear b.b) well-lit to allow for safe exit 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 kits available are adequate. * Record review: Logistics Management Regulation (Document No.: SHZ-3A-14, Rev. B3, issue date: July 13, 2020) states the detail of a) the cleaning and sanitation program b) the pest control program. It states a) the detail of the preventive maintenance program, b) including emergency response supporting facilities. * Record review: Risk and Opportunity Control Procedure (Doc.: SHZ-EQP-11, Rev. A1, Issue date: May 20, 2020) states a) a risk assessment for rented apartments, 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 rented apartments. * Record review: 12 out of 12 sanitation program tracking records covering the period of July 2019 to June 2020 demonstrate the sanitation program is implemented consistently and conform Food, Sanitation and Housing Management Procedure. * Record review: 12 out of 12 pest control logs covering the period of July 2019 to June 2020 demonstrate the pest control program is implemented consistently and conform Food, Sanitation and Housing Management Procedure. * Management interview: Ms. Li Bo / Safety Engineer a) states how the facility ensures dormitory and sanitary facility standards, b) details how the facility tracks b.a) the inspections b.b) resulting actions. c) confirms the facility performs for rented apartments c.a) a risk assessment c.b) on-site inspections c.c) emergency drills. * Worker interview: 20 out of 70 workers a) confirm the dormitory facilities are a.a) adequate a.b) clean a.c) safe b) detail for rented apartments b.a) how on-site inspections are performed b.b) how emergency drills are performed. 50 out of 70 workers state they live outside on their own, not in the dormitory. * Supporting evidence reference(s): N/A
Question #	VAP-B7.3a
Question Text	Is there a canteen or food services?
Rating	Yes

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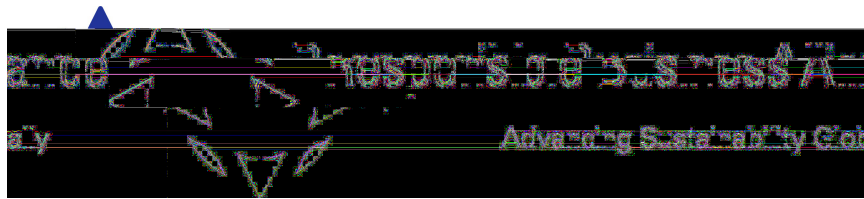
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Conclusion	
Data points	
Question #	VAP-B7.3b
Question Text	Canteens (cafeterias) are clean, well maintained, and well managed
Rating	Conformance
Conclusion	Canteens (cafeterias) are clean, well maintained, and well managed.
Data points	<p>* Site observation: a) Canteen, kitchen and food preparation areas are a.a) clean a.b) 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: Logistics Management Procedure (Doc. No: SHZ-3A-14, Rev. B2, Issue date: July 13, 2020) states the detail of a) the cleaning and sanitation program b) the pest control program. It states the detail of the preventive maintenance program including emergency response supporting facilities.</p> <p>* Record review: Canteen Management Procedure (Document No.: SHZ-EAW-08, Rev. A1, issue date: July 8, 2020) 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 of July 2019 to June 2020 demonstrate the sanitation program is implemented consistently and conform Logistics Management Procedure.</p> <p>* Record review: 12 out of 12 sanitation program tracking records covering the period of July 2019 to June 2020 demonstrate the sanitation program is implemented consistently and conform Logistics Management Procedure.</p> <p>* Record review: 4 out of 4 pest control logs covering the period of July 2019 to June 2020 demonstrate the pest control program is implemented consistently and conform Logistics Management Procedure.</p> <p>* Record review: 4 out of 4 building preventive maintenance program logs covering the period of July 2019 to June 2020 demonstrate the preventive maintenance program is implemented consistently and conform Logistics Management Procedure.</p> <p>* Management interview: Ms. Li Bo / EHS Engineer a) states how the canteen/cafeteria standards are a.a) implemented a.b) maintained b) details how records are kept.</p> <p>* Worker interview: 70 out of 70 workers confirm a) confirm the canteen/cafeteria a.a) is clean a.b) food preparation is hygienic.</p> <p>* Supporting evidence reference(s): N/A</p>
HEALTH AND SAFETY COMMUNICATION	
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 safety concerns
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 safety concerns.

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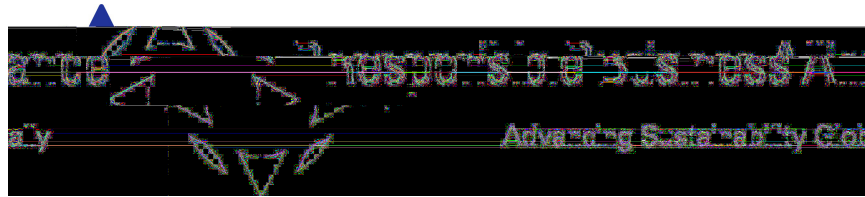
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<p>Data points</p>	<p>* Site observation: a) Health and Safety communication is clearly posted in a location accessible by workers b) Appropriate signs, placards and labels identifying hazards are clearly visible for: b.a) chemical hazards b.b) physical 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.</p> <p>* Record review: Training Management Control Procedure (Document No.: SHZ-SAP-07, Rev. A1, issue date: January 3, 2018) 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. It 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 in 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.</p> <p>* Record review: Health & Safety training needs analysis report (Doc. No. Nil., Issue date: January 1, 2020) states the detailed a) analysis b) methodology c) results d) is conform to Training Management Control Procedure.</p> <p>* Record review: Health & safety training plan (Doc. No. Nil, Rev. Nil, Issue date: January 1, 2020) states the topics consistent with the training needs analysis and conform to Training Management Control Procedure.</p> <p>* Record review: 2 out of 2 Health & Safety training materials covering the period of July 2019 to June 2020 demonstrate conformance with Training Management Control Procedure, health & safety training needs analysis report and training plan.</p> <p>* Record review: 2 out of 2 Health & Safety training records covering the period of July 2019 to June 2020 demonstrate all workers are trained in conformance with Training Management Control Procedure, health & safety training needs analysis report and training plan.</p> <p>* Record review: 12 out of 12 Safety concern logs/grievance records covering the period of July 2019 to June 2020 demonstrate safety concerns are encouraged and raised as per Training Management Control Procedure.</p> <p>* Record review: 12 out of 12 Health & Safety communication records covering the period of July 2019 to June 2020 demonstrate Training Management Control Procedure is implemented consistently.</p> <p>* Management interview: Ms. Li Bo / Safety Engineer a) states how management ensures workers understands 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 was 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 safety concerns h) explains how these safety concerns are evaluated, addressed and communicated to workers.</p> <p>* Worker interview: 70 out of 70 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 were trained as new employee d) confirm when they were 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 how they are encouraged to raise safety concerns h.a) what system is available to raise a safety concern h.b) confirm raised safety concerns have been acted on.</p> <p>* Supporting evidence reference(s): N/A</p>
<p>HEALTH & SAFETY PROVISION GOOD PRACTICES</p>	
<p>Question #</p>	<p>VAP-B9.1a</p>
<p>Question Text</p>	<p>Are there Health & Safety provision good practices?</p>
<p>Rating</p>	<p>No</p>
<p>Conclusion</p>	<p></p>
<p>Data points</p>	<p></p>

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C) Environment	
ENVIRONMENTAL PERMITS AND REPORTING	
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	<p>* Site observation: a) There are no unidentified impacts to the a.a) air emissions a.b) wastewater discharge a.c) storm water exposure a.d) hazardous materials storage and use a.e) generation of waste (solid and hazardous).</p> <p>* Record review: Environment, Health and Safety Manual (Doc. No: SHZ-EQS-01, Rev. B3, Issue date: April 14, 2020) 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.</p> <p>* Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) 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 is initiated.</p> <p>* Record review: 6 out of 6 Environmental Impact Assessment (EIA) Forms (one sample, Form No: Nil., Issue date: February 2007) are provided for review.</p> <p>* Record review: 6 out of 6 Environmental Impact Assessment approvals (one sample, Approval No: [2007]J051, Issue date: March 15, 2007) are provided for review.</p> <p>* Record review: 6 out of 6 Environmental Protection Check Acceptances (one sample, Approval No: [2010]11, Issue date: March 19, 2010) are provided for review.</p> <p>* Record review: Pollutant Discharge Permit (Permit No: 91441300791200462B001X, valid from December 31, 2019 to December 30, 2022, issued by Huizhou Ecological and Environmental Protection Bureau) is provided for review.</p> <p>* Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor a) state which environmental permits, approvals, registrations or licenses and tests, environmental impact assessments reports are required b) details what testing was done c) explains which process is in place to ensure permits are renewed before current permits expired d) states the operations that have triggered or may potentially trigger an environmental permit.</p> <p>* Supporting evidence reference(s): N/A</p>
Question #	VAP-C1.2a
Question Text	Is environmental reporting required?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C1.2b
Question Text	Reporting to environmental authorities as required by law is performed timely
Rating	Conformance
Conclusion	Reporting to environmental authorities as required by law is performed timely.

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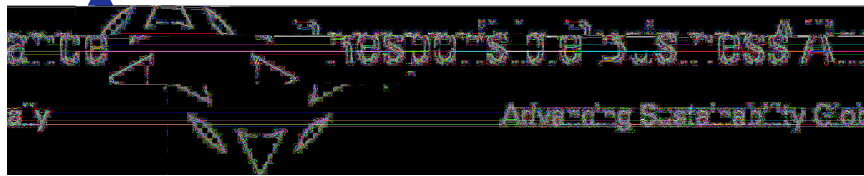
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Data points	<ul style="list-style-type: none"> * Record review: Information Communication Procedure (Doc. No: SHZ-EAP-01, Rev. A4, Issue date: May 20, 2020) states the documented process to ensure reports are submitted timely. * Record review: Environment, Health and Safety Permits and Reports List (Doc. No: Nil., Issue date: July 10, 2020) shows when reports are submitted timely. * Record review: Hazardous Waste Management Plan (Document No. Nil., Issue date: March 1, 2020) is reported on Guangdong Hazardous Waste Transportation Platform. * Record review: 12 out of 12 hazardous waste annual storage and transportation reporting records covering the period of July 2019 to June 2020 are provided for review. * Record review: 4 out of 4 Environmental protection tax declaration form for air emission (latest reporting date: April 24, 2020) states that the facility has reported its environmental pollutants (just air emissions) to the local department quarterly. * Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor a) states which environmental reports are required to be submitted b) details how often and when the reports must be submitted c) explains the process in place to ensure reports are submitted before or on due date. * Supporting evidence reference(s): N/A
POLLUTION PREVENTION AND RESOURCE REDUCTION	
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	<ul style="list-style-type: none"> * Record review: Objectives, Targets and Program Management Procedure (Document No.: SHZ-EQP-08, Rev. A3, Issue date: May 20, 2020) states a) the details of the programs to 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) 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. * Record review: Objectives, Targets and Program Management Plan (Document No.: Nil, Rev. Nil, Issue date: January 1, 2020) reveals conformance with Objectives, Targets and Program Management Procedures with targets set annual objectives set for each identified material emission. * Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor 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. * Worker interview: 70 out of 70 workers (including 3 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. * Supporting evidence reference(s): N/A
HAZARDOUS SUBSTANCES	
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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<p>Conclusion</p>	<p>Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. [Regulation for Safety of Dangerous Chemical. Article 20, units that produce, store and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, fire fighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely./ 《危险化学品安全管理条例》第二十条, 生产、储存、使用危险化学品的, 应当根据危险化学品的种类、特性, 在车间、库房等作业场所设置相应的监测、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、消毒、中和、防潮、防雷、防静电、防腐、防渗漏、防护围堤或者隔离操作等安全设施、设备, 并按照国家标准和国家有关规定进行维护、保养, 保证符合安全运行要求。]</p>
<p>Data points</p>	<p>* Site observation: a) Hazardous substances are adequately and effectively a.a) categorized a.b) handled a.d) moved within the facility b) Access to hazardous substances is controlled c) potential employee exposure methods are adequate and effective c.a) segregation c.c) ventilation, fire protection c.d) appropriate storage cabinets d) Hazard signage and information is appropriately available at the points of use d.b) storage. No secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. * Record review: Hazardous Chemical Management Procedure (Document No.: SHZ-EAW-12-No. 8, Rev. A1, Issue date: April 21, 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. * Record review: 5 out of 5 material information sheets covering the period of July 2019 to June 2020 demonstrate: a) hazardous material information is available b) in a language understood by the worker. * Record review: 12 out of 12 inventory records covering the period of July 2019 to June 2020 demonstrate accurate chemical inventory records are maintained. * Record review: 4 out of 4 inspection records covering the period of July 2019 to June 2020 demonstrate the facility does not identify the risk of no secondary containment for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. * Record review: 4 out of 4 manifests and shipping papers covering the period of July 2019 to June 2020 demonstrate hazardous substances inventory is accurate and maintained. * Record review: 8 out of 8 hazardous substances vendor licenses covering the period of July 2019 to June 2020 demonstrate only vendors approved and licensed by the local regulatory authorities are used. * Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor confirms that no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. a) states what hazardous substances are used on site b) details what the requirements are on the use and storage of hazard substances c) explains what procedures are to manage and minimize the risk of the hazardous substances d) states what process is used to select the purchase of new hazardous chemicals. * Worker interview: 70 out of 70 workers (including 3 workers responsible for resource reduction and control) state what hazardous substances procedures are in place for their specific duties. * Worker interview: 2 out of 2 workers responsible for chemical management in lamination workshop on 1/F of one 7-storey production building confirm that no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. * Supporting evidence reference(s): C3.1b.jpg</p>
<p>Question #</p>	<p>VAP-C3.2</p>
<p>Question Text</p>	<p>Hazardous waste is safely disposed of including a disposal supplier(s) assessment</p>
<p>Rating</p>	<p>Conformance</p>
<p>Conclusion</p>	<p>Hazardous waste is safely disposed of including a disposal supplier(s) assessment.</p>

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Data points	<p>* Record review: Waste Control Procedure (Document No: SHZ-EAW-01, Rev. A2, Issue date: December 29, 2018) states a) the details for the a.a) safe return 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: Waste Reduction Program and Tracking Record (Document No. Nil, Rev. Nil., Issue date: July 5, 2020) 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: 8 out of 8 Hazardous waste vendor assessments covering the period of July 2019 to June 2020 demonstrate Waste Control Procedure is consistently implemented and hazardous waste vendors conform law and contractual requirements.</p> <p>* Record review: 8 out of 8 hazardous waste vendor licenses covering the period of July 2019 to June 2020 are provided for review.</p> <p>* Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor 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: 70 out of 50 workers (including 3 workers responsible for resource reduction and control) state how waste shipments are documented.</p> <p>* Supporting evidence reference(s): N/A</p>
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SOLID WASTE	
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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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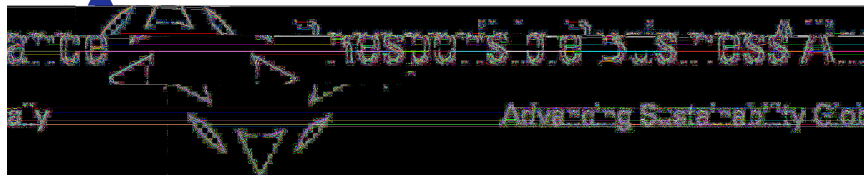
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Data points	<p>* Site observation: a) Waste is adequately and effectively a.a) categorized a.b) handled a.c) stored a.d) transported within the facility b) access to waste is controlled c) potential employee exposure methods are adequate and effective 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 is appropriately available f) reduction programs are visible.</p> <p>* Record review: Waste Control Procedure (Document No: SHZ-EAW-01, Rev. A2, Issue date: December 29, 2018) 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: 4 out of 4 material information sheets covering the period of July 2019 to June 2020 demonstrate: a) material information is available b) in a language understood by the worker.</p> <p>* Record review: 4 out of 4 inventory records covering the period of July 2019 to June 2020 demonstrate accurate chemical inventory records are maintained.</p> <p>* Record review: 12 out of 12 inspection records covering the period of July 2019 to June 2020 demonstrate inspection records of substances and their points of storage and use are accurate and maintained.</p> <p>* Record review: 23 out of 23 waste manifests and shipping papers covering the period of July 2019 to June 2020 demonstrate chemical inventory is accurate and maintained.</p> <p>* Record review: Objectives, Targets and Program Management Plan (Document No.: Nil, Rev. Nil, Issue date: January 1, 2020) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made in off track.</p> <p>* Management interview: Mr. Shaofeng Xu / Environmental Protection Supervisor 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 f) 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: 70 out of 70 workers (including workers responsible for resource reduction and control) state the waste procedures for their specific function.</p> <p>* Supporting evidence reference: N/A</p>
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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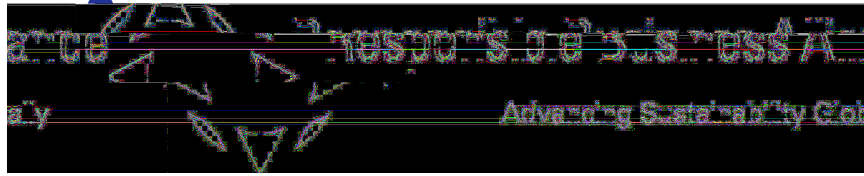
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Data points	<p>* Site observation: a) Equipment for air emission treatment is a.a) well maintained a.b) appropriate a.c) identified b) Air emission are b.a) treated prior to discharge b.b) in accordance with permit requirement c) Reduction programs are visible within the Auditee.</p> <p>* Record review: Air Emission Treatment Management Procedure (Document No. SHZ-EWW-10, Rev. A3, Issue date: August 30, 2019) states a) the detail of the process for a.a) air emission treatment a.b) air emission discharge a.e) track a.f) review a.g) 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 of July 2019 to June 2020 demonstrate inspection records of air emissions are performed and conform Air Emission Treatment Management Procedure.</p> <p>* Record review: 10 out of 10 air emission testing and reporting records (One sample, Report No. BHJQ2020-0239, Issue date: April 10, 2020) demonstrates testing is performed and conform Air Emission Treatment Management Procedure.</p> <p>* Record review: 12 out of 12 preventive maintenance records covering the period of July 2019 to June 2020 demonstrate preventative maintenance is carried out consistent with Air Emission Treatment Management Procedure.</p> <p>* Record review: Reduction program and tracking (Doc. No. Nil, Issue date: January 1, 2020) 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: Mr. Shaofang Xu / Environmental Protection Supervisor 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.</p> <p>* Worker interview: 70 out of 70 workers (including 3 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.
Data points	<p>* Site observation: No excessive boundary noise is detected.</p> <p>* Record review: Monitoring and Testing Procedure (Document No. SHZ-EWP-01, Rev. A2, Issue date: November 20, 2018) 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.</p> <p>* Record review: Environmental noise testing and reporting record (Report No: BHJZ2020-0255, Issue date: May 20, 2020) demonstrates testing is performed and conform Monitoring and Testing Procedure.</p> <p>* Record review: 12 out of 12 preventive maintenance records covering the period of July 2019 to June 2020 demonstrate preventative maintenance is carried out consistent with Monitoring and Testing Procedure.</p> <p>* Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor a) states what environmental noise complaints, b) details the program in place to monitor environmental noise.</p> <p>* Worker interview: 70 out of 70 workers (including 3 workers responsible for resource reduction and control) state the controls for environmental noise (equipment or processes).</p> <p>* Supporting evidence reference(s): N/A</p>

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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.
Data points	<p>* Record review: Hazardous Substance Management Procedure (Document No: SHZ-HQP-01, Rev. E5, Issue date: July 1, 2020) 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.</p> <p>* Record review: 3 out of 3 chemical composition of products and specifications covering the period of July 2017 to June 2020 demonstrate consistency with Hazardous Substance Management Procedure and the applicable requirements.</p> <p>* Record review: 3 out of 3 restricted substance no. use statements covering the period of July 2017 to June 2020 demonstrate consistency with Hazardous Substance Management Procedure and the applicable requirements.</p> <p>* Record review: 3 out of 3 material restriction monitoring & reporting records covering the period of July 2017 to June 2020 demonstrate a) consistency with Hazardous Substance Management Procedure, b) are available for the last 3 years.</p> <p>* Management interview: Mr. Shaofang Xu, Environmental Protection Supervisor 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.</p> <p>* Supporting evidence reference(s): N/A</p>
WATER MANAGEMENT	
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.

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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 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 / materials are in place to respond to a possible water channel contamination</p> <p>* Record review: Water diagram (Doc. No. Nil., Rev. Nil., Issue date: Nil.) states clearly the source of water.</p> <p>* Record review: Wastewater Treatment Management Procedure (Document No: SHZ-EWW-07, Rev. B3, Issue date: March 13, 2019) 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 past spills/water channel contamination and corrective/preventive action plan.</p> <p>* Record review: Reduction program and tracking (Doc. No. Nil, Issue date: January 1, 2020) 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: 2 out of 2 material information sheets covering the period of July 2019 to June 2020 demonstrate a) material information is available, b) in a language understood by the worker.</p> <p>* Record review: 3 out of 3 water channel contamination logs covering the period of July 2017 to June 2020 demonstrate: a) identification of water channel contamination b) sources with a description of spills/water channel contamination c) available for past 3 years.</p> <p>* Record review: 4 out of 4 inspection records of wastewater and their points of storage covering the period of July 2019 to June 2020 demonstrate inspection records of wastewater and their points of storage are accurate and maintained.</p> <p>* Record review: 2 out of 2 wastewater inventory records covering the period of July 2019 to June 2020 demonstrate wastewater inventory records are maintained.</p> <p>* Record review: Wastewater vendor license (Document No. Nil., Issue date: Nil.) demonstrates only vendors approved and licensed by the local regulatory authorities are used.</p> <p>* Record review: 12 out of 12 wastewater manifests and shipping discharge papers covering the period of July 2019 to June 2020 demonstrate only vendors approved and licensed by the local regulatory authorities are used.</p> <p>* Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor 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: 70 out of 70 workers (including 3 workers responsible for resource reduction and control) state what is his role and responsibilities on water discharge and control of water channel contamination.</p> <p>* Supporting evidence reference(s): N/A</p>
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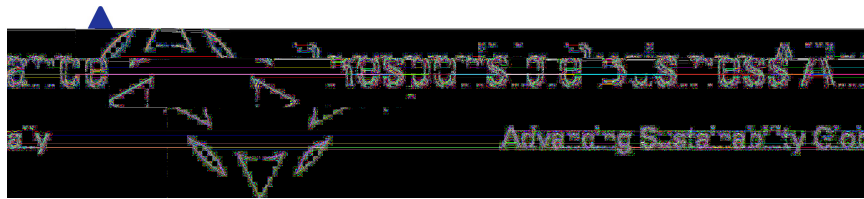
ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Question #	VAP-C8.1a
Question Text	Is electricity or fuel directly purchased?
Rating	Yes
Conclusion	
Data points	
Question #	VAP-C8.1b
Question Text	Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked and documented
Rating	Conformance
Conclusion	Energy consumption and all relevant Scopes 1 and 2 Greenhouse gas (GHG) emissions are tracked and documented.

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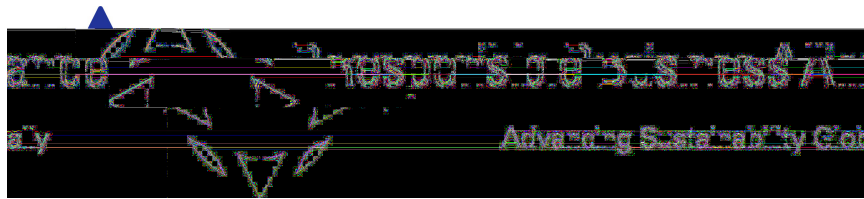
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Data points	<ul style="list-style-type: none"> * Site observation: There is no significant energy consumption or GHG emissions at the Auditee that are not tracked and documented. * Record review: Energy Management Procedure (Document No: SHZ-EWW-01, Rev. A2, Issue date: December 29, 2018) states the requirement and process to a) identify the sources of electricity and other energy b) create a baseline of energy use (by source) c) report energy use to the corporate HQ or customers at the customers' request d) create an emissions statement including d.a) value of Scope 1 and 2 emissions d.b) a description of its boundary and source e) report GHG emissions to the corporate HQ or customers at the customers' request. * Record review: 12 out of 12 energy and GHG communications covering the period of July 2019 to June 2020 demonstrate a) energy use b) GHG Scope 1 and Scope 2 emissions c) has been reported conform Energy Management Procedure. * Record review: 12 out of 12 energy and GHG baseline records covering the period of July 2019 to June 2020 demonstrate energy and GHG baseline data is available as per Energy Management Procedure. * Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor a) states how all on-site combustion, purchased electricity, and fuels 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 not calculated at the facility level c.a) provides evidence that GHG are c.a.a) aggregated c.a.b) reported. * Supporting evidence reference(s): N/A
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"> * Site observation: a) Technology or management strategies to minimize energy consumption and GHG emissions are visible. b) Reduction programs are visible. * Record review: GHG Emission Reduction program and tracking (Doc. No. Nil., Issue date: January 2020) states the details of the reduction program including a) Annual objectives b) Regular objective tracking c) Progress monitoring d) Adjustments made if off track. * Management interview: Mr. Shaofang Xu / Environmental Protection Supervisor 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. * Worker interview: 70 out of 70 workers (including 3 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. * Supporting evidence reference(s): N/A
ENVIRONMENT PROVISION GOOD PRACTICES	
Question #	VAP-C9.1a
Question Text	Are there Environment provisions good practices?
Rating	No
Conclusion	
Data points	
D) Ethics	
BUSINESS INTEGRITY	
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 procedure 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.

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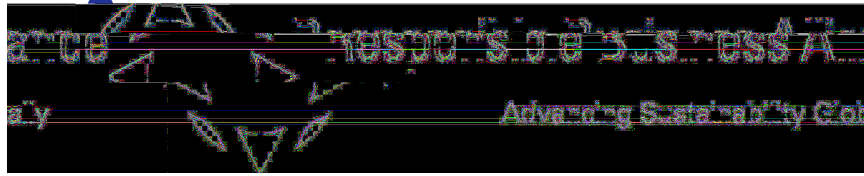
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Data points	<p>* Record review: Business Ethics Regulation Procedure (Doc. No.: SHZ-SAP-25, Rev. A2, Issue date: May 8, 2020) states a) the commitment to uphold the highest standards of integrity b) in all business interactions c) with a zero tolerance to d) any and all forms of bribery, corruption, extortion and embezzlement. 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: There is no Ethics investigation reports because no non-conformance on integrity is detected or reported.</p> <p>* Record review: 70 out of 70 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 c) No confirmed violations.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer 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) confirm how this policy is regularly c.a) monitored c.b) investigated c.c) allegations of improper business addressed 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: 70 out of 70 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>
NO IMPROPER ADVANTAGE	
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.
Data points	<p>* Record review: Anti-corruption and bribery and benefit conflict control management procedure (Doc. No.: SHZ-SAP-23, Rev.A3, Issue date: May 8, 2020) states the detailed process to ensure a) Gifts to or from suppliers and customers is not excessive in cost b) Bribes or other methods of obtaining undue or improper advantage are not being b.a) promised b.c) 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: 70 out of 70 declarations of conflict of interest covering the period of July 2019 to June 2020 are available.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states the detail of the policy on gifts, its maximum value and frequency 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: 70 out of 70 workers a) state the detail of the policy on gifts, its maximum value and frequency 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>
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.

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Data points	<ul style="list-style-type: none"> * Site observation: Publicly communicated company information is posted and is accurate. * Record review: Information disclosure control procedure (Doc. No.: SHZ-SAP-28, Rev. A2, Issue date: May 8, 2020) 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. It states the detailed program 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 inspect/assess/audit records verifying they are accurate d) investigate misrepresentation by d.a) workers d.b) managers d.c) their agents. * Record review: Annual financial report (No.: 天职业字【2020】27425号, Issue date: April 23, 2020): Financial and annual report will expire till next Financial and annual report published, issued by Tianzhi International Accounting Firm Shenzhen Branch) confirm accurate information to the public. * Record review: There is no case of misreporting, record falsification or misrepresentation, inspection and investigation records are not available, as there is no case of misreporting, record falsification or misrepresentation case happened in the facility. * Management interview: Ms. Valerie Xiao/Production Management System Engineer 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 procedure and checks are in place to ensure public information is accurate and not misleading. * Worker interview: 70 out of 70 workers confirm that job posting and recruitment information is accurate and not misleading. * Supporting evidence reference(s): N/A
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)
Data points	<ul style="list-style-type: none"> * Site observation: IP and business information are visibly protected. * Record review: Intellectual property management manual (Doc. No.: SHZ-IYF-01, Rev. D2, Issue date: May 19, 2020) states a) the commitment to protect information received from a.a) suppliers a.b) customers as part of the contracting process b) IP ownership c) ensure protection of IP. states a) the commitment to protect information received from a.a) suppliers a.b) customers as part of the contracting process b) IP ownership c) ensure protection of IP d) detailed IP measures and guidelines about the d.a) distribution d.b) dissemination of information d.c) to protect information from suppliers and customers and IP. * Record review: 70 out of 70 employment contracts demonstrate non-disclosure agreements of workers and management is in place. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states a) states the procedure 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. * 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 * Supporting evidence reference(s): N/A
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.

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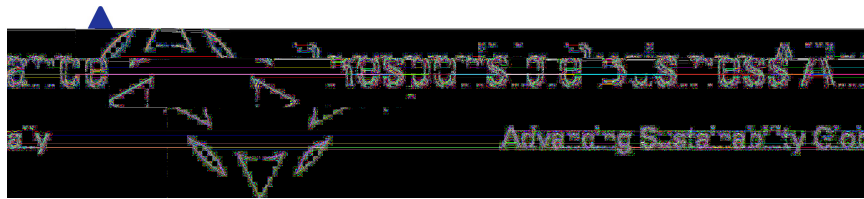
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Data points	<ul style="list-style-type: none"> * Record review: Fair competition and anti-scheme control procedure (Doc. No.: SHZ-SAP-20, Rev. A2, Issue date: May 8, 2020) states a) the detailed process ensuring standards are upheld for a.a) fair business 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 procedure are in place related to c.a) fair business c.b) advertising c.c) competition are in place. * Management interview: Ms. Valerie Xiao/Production Management System Engineer Manager states the detail of the prohibition of collusion and fair business policy. * Worker interview: 1 out of 1 office worker states the detail of the prohibition of collusion and fair business. * Supporting evidence reference(s): N/A
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	<ul style="list-style-type: none"> * Record review: Protection of whistleblower control procedure (Doc. No.: SHZ-SAP-27, Rev. A2, Issue date: May 8, 2020) 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 c) Monitoring procedure related to d.a) protection of identity d.b) retaliation. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states how retaliation is prevented and monitored. No retaliation case is detected or reported. * Worker interview: 70 out of 70 workers a) state how management has assured them of non-retaliation b) confirm they are unaware of any retaliation case to their knowledge. * Supporting evidence reference(s): N/A
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	
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 purchasing of the 3TG minerals does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in the Democratic Republic of the Congo or an adjoining country
Rating	Conformance
Conclusion	Adequate and effective Conflict Minerals Policy and Management Program to reasonably assure that purchasing of the 3TG minerals does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Democratic Republic of the Congo or an adjoining country.

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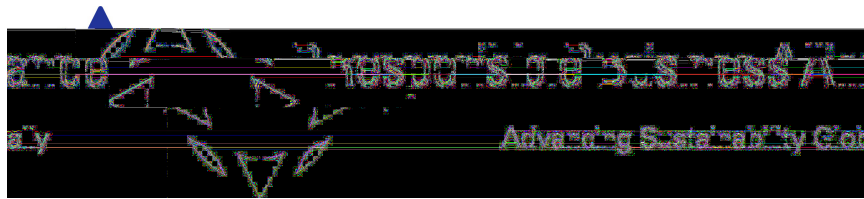
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Data points	<ul style="list-style-type: none"> * Record review: Business Ethics Regulation Procedure (Doc. No.: SHZ-SAP-25, Rev. A2, Issue date: May 8, 2020) states a commitment to reasonably assure that purchasing of the 3TG minerals does not finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo including a) Publicly communicated. b) Cover all 3TG included in the company's products c) Commit the company to exercise due diligence on the origin and chain of custody of minerals in accordance with the OECD Due Diligence Guidance d) NOT to source 3TG that directly or indirectly benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo. * Record review: Non-conflict metal control procedure (Doc. No.: SHZ-SAP-26, Rev. A3, Issue date: April 14, 2020) states the detail of the conflict minerals management program for suppliers providing the 3TG contained products within its own operations, including: a) Identifying a senior management person responsible for implementation of the due diligence program b) Including sourcing requirements in written agreements and/or contracts with suppliers c) Mitigate any risks identified in accordance with the OECD Due Diligence Guidance including suspend or terminate the business relationship with the supplier when the risk mitigation is unsuccessful d) Reviewing the procedures, on an annual basis, to ensure conformance and improve where process improvements have been identified. * Record review: 20 out of 20 due diligence reports covering the period of July 2015 to June 2020 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 Business Ethics Regulation procedure (Doc. No.: SHZ-SAP-25, Rev. A2, Issue date: May 8, 2020) and Non-conflict metal control procedure (Doc. No.: SHZ-SAP-26, Rev. A3, Issue date: April 14, 2020). * Record review: Internal audit report (Doc.No.: Nil., Issue date: July 26, 2019) confirms an annual review of the program is undertaken and consistent with Non-conflict metal control procedure. The conclusions indicate purchasing of the 3TG minerals does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in the Covered Countries. * Record review: 5 out of 5 supplier mitigation plans covering the period of July 2015 to June 2020 demonstrate the investigations following any risk is identified, the analysis is conducted for any violations of conflict mineral policy, the suppliers are required to correct the violations and designate staffs are assigned to ensure the violations closed. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states a) The detail of the Conflict Minerals policy and Conflict Minerals and management system b) The facility will stop using the suppliers when they are not in conformance with the Conflict Minerals Policy or a potentially conflict-affected source. c) All 3TG contained suppliers are required to sign the declaration for no using of conflict minerals. * Worker interview: 1 out of 1 staff who is responsible for purchasing state a) The details of the Conflict Minerals policy and Conflict Minerals and the Conflict-Free Sourcing Program b) The facility will stop using the suppliers when they are not in conformance with the Conflict Minerals Policy or a potentially conflict-affected source. c) All 3TG contained suppliers are required to sign the declaration for no using of conflict minerals. * Supporting evidence reference(s): N/A
PRIVACY	
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"> * Site observation: Personal information is visibly protected. * Record review: Facility Ethics Construction Implement Work Standard (Doc. No.: SHZ-SAS-3A-03, Rev. A, Issue date: May 8, 2020) states the detailed process to a) protect of personal information b) Safeguards to prevent unauthorized disclosure of personal information c) Monitoring procedure related to protection of personal information. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states what measures are in place to protect privacy. * Worker interview: 70 out of 70 workers state how their personal information is protected. * Supporting evidence reference(s): N/A
ETHICS PROVISION GOOD PRACTICES	
Question #	VAP-D9.1a
Question Text	Are there Ethics provisions good practices?
Rating	No
Conclusion	
Data points	

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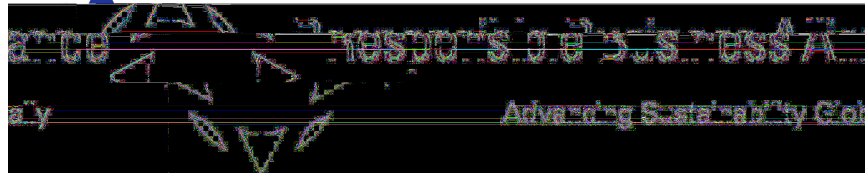
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E) Mgt. System	
CERTIFICATIONS	
Question #	VAP-E0.1a
Question Text	Does the facility have credible, accredited third-party certified (valid) management systems for - A) Labor (e.g. SA8000), B) Health and Safety (e.g. OHSAS18001), C) Environment (e.g. 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	Environment: Certification of ISO 14001:2015 (certificate number: EMS646212, Issue date: March 31, 2019, Expiry date: March 30, 2022, issued by: BSI) Health & safety: Certification of ISO 45001:2018 (certificate number: OHS646213, Issue date: March 31, 2019, Expiry date: March 30, 2022, issued by: BSI)
Conclusion	
Data points	
COMPANY COMMITMENT	
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	<ul style="list-style-type: none"> * 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: Social Responsibility Manual (Doc. No.: SHZ-SAM-01, Rev. A3, Issue date: April 20, 2020) contains the statement including i) Labor ii) signed by the highest-level manager at the facility or company with a stated commitment to regulatory compliance and other requirements to continuous improvement. b) The policy is appropriate for the nature and scope of the operations. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states details the policy. * Worker interview: 70 out of 70 workers detail the policy. * Supporting evidence reference(s): N/A
MANAGEMENT ACCOUNTABILITY AND RESPONSIBILITY	
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
Conclusion	Responsibilities are adequately defined for all employees and workers (sr managers to workers) for implementation of management systems, and for compliance with laws and code pertaining to: A) Labor and D) Ethics.

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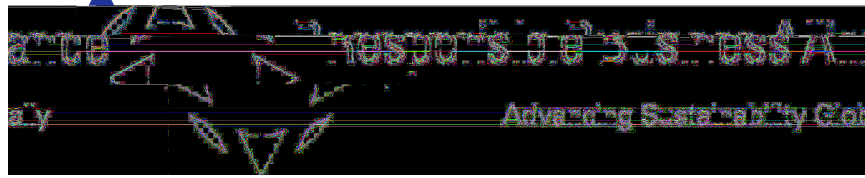
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Data points	<ul style="list-style-type: none"> * Record review: Social Responsibility Manual (Doc. No.: SHZ-SAM-01, Rev. A3, Issue date: April 20, 2020) states Mr. White Yin / General Manager is assigned responsibility for implementing programs a) to ensure compliance with laws and regulations the requirements of the RBA b) is authorized to implement programs, procedure and corrective actions. It states detailed responsibilities and authority of each organizational level are documented a) for normal situations b) for emergency situations including Labor and Ethics. * Management interview: Ms. Valerie Xiao/Production Management System Engineer states a) the responsibilities and authorities of each level within the organization including the senior executive for each component b) explains how responsibilities and reporting lines are documented and communicated c) states under what conditions an override for the management system would be allowed. * Worker interview: 70 out of 70 workers a) state their responsibilities against each of the components b) State who is the responsible management representative for each component. * Supporting evidence reference(s): N/A
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"> * Record review: Management review control procedure (Doc. No.: SHZ-SAP-14, Rev. A2, Issue date: April 14, 2020) states the detailed annual management system review process * Record review: Management review meeting minutes and material (Doc. No.: Nil, Rev. Nil, Issue date: February 27, 2020) provides a. a) Labor and d) 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 Management Review Control Procedure. * Record review: Management review plan (Doc. No.: Nil, Rev. Nil, Issue date: February 28, 2020) 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. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) explains the management system review process b) confirm when the last meeting was held c) details what actions result from the review * Supporting evidence reference(s): N/A
LEGAL AND CUSTOMER REQUIREMENTS	
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 pertaining to: A) Labor and D) Ethics is established.
Data points	<ul style="list-style-type: none"> * Record review: Law regulation and other requirement collection and update control procedure (Doc. No.: SHZ-SAP-01, Rev. A4, Issue date: May 8, 2020) states the detailed compliance process for a. a) Labor a. b) Ethics b) quarterly c) to maintain a current understanding of applicable laws and regulations d) Identify e) Track f) Assess g) Integrate h) Implement i) Record. It does not indicate the compliance process to monitor, identify and ensure compliance with customer requirements pertaining to A) Labor and D) Ethics. * Record review: Labor and ethics laws and regulations Identification Evaluation Form (Doc. No.: Nil,, Rev. Nil, Issue date: May 8, 2020) shows when reports are submitted timely and all the law, regulations and client requirements applicable in the facility. * Record review: 4 out of 4 changed procedure covering the period of July 2019 to June 2020 confirm the consistent implementation of Law regulation and other requirement collection and update control procedure (Doc. No.: SHZ-SAP-01, Rev. A4, Issue date: May 8, 2020). * Management interview: Ms. Valerie Xiao/Production Management System Engineer 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. * Supporting evidence reference(s): N/A

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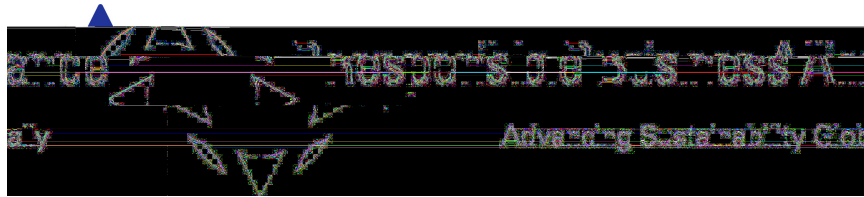
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RISK ASSESSMENT AND RISK MANAGEMENT	
Question #	VAP-E4.1
Question Text	An adequate and effective risk management process to identify, assess, and minimize/mitigate/control its risks in the areas of: A) Labor B) Health & Safety C) Environment and D) Ethics is in place
Rating	Conformance
Conclusion	An adequate and effective risk management process to identify, assess, and minimize/mitigate/control its risks in the areas of: A) Labor and D) Ethics is in place.
Data points	<ul style="list-style-type: none"> * Site observation: Control measures are in place for identified risks. * Record review: Labor and ethics risk assessment and management control procedure (Doc. No.: SHZ-SAP-22, Rev. A3, Issue date: May 8, 2020) states a) the detailed risk assessment process for a.a) Labor a.c) 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 f.a) to minimize such risk e. b) procedural controls and/or improvement objective f) Effectiveness of controls f.a) is evaluated f.b) on a regular basis. * Record review: 2 out of 2 risk assessment records covering the period of July 2019 to June 2020 demonstrate consistent implementation of Labor and ethics risk assessment and risk control procedure. * Record review: 4 out of 4 risk assessment action plans covering the period of July 2019 to June 2020 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. * Management interview: Ms. Valerie Xiao, Production Management System Engineer: a) details the risk assessment process b) confirm when the last risk assessment was carried out c) explains what controls and corrective actions are in place. * Supporting evidence reference(s): N/A
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 (improvement) objectives and targets, developing and implementing improvement plans, regularly reviewing progress toward achieving targets, and making appropriate adjustments if needed is in place.
Data points	<ul style="list-style-type: none"> * Record review: Social Responsibility Manual (Doc. No.: SHZ-SAM-01, Rev. A3, Issue date: April 20, 2020) 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. * Record review: Health and Safety management performance and target, indicator overall tracking form (Doc. No.: Nil, Rev. Nil, Issue date: July 1, 2020) 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 Social Responsibility Manual (Doc. No.: SHZ-SAM-01, Rev. A3, Issue date: April 20, 2020). * Management interview: Ms. Valerie Xiao, Production Management System Engineer a) details the objectives/targets process b) confirms the current targets c) states when the last review is, for d.a) Labor d.b) Ethics. * Worker interview: 70 out of 70 workers state a) state the targets relevant to them for A) Labor and D) Ethics. * Supporting evidence reference(s): N/A
TRAINING	
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, procedure, job related aspects and performance targets related to A) Labor, C) Environment, and D) Ethics

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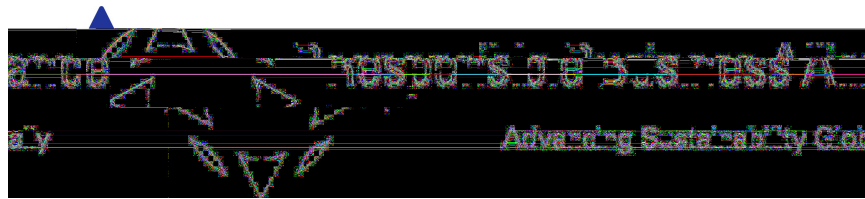
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Data points	<p>* Record review: Training Management Control Procedure (document number: SHZ-SAP-07, version: A1, issue date: January 3, 2020) state that the process of A) Labor, C) Environment and D) Ethics training through a) New employee orientation plan b) Training needs analysis c) Training plan d) Training material e) Training records f) Training frequency g) Training efficiency verification. All communications and training must be in a language understood by the worker.</p> <p>* Record review: Training needs analysis (no document number, issue date: December 24, 2019) states the detailed analysis, methodology, results and covers the minimum required topics.</p> <p>* Record review: 2019 Training Plan (no document number, issue date: December 26, 2019) states the topics consistent with the training needs analysis, type of training, frequency and training material references.</p> <p>* Record review: 6 out of 6 training materials covering the period of July 2019 to June 2020 demonstrate all training materials are available as per the training plan and cover a) the minimum required topics b) a general New Employee Orientation package.</p> <p>* Record review: 12 out of 12 training records covering the period of July 2019 to June 2020 (latest training date: June 30, 2020) demonstrate all workers are trained prior to the beginning of work and regularly thereafter as per the training program.</p> <p>* Record review: Effectiveness evaluation plan (No document number, date: July 10, 2019) states the frequency of the evaluation to verify the effectiveness of training with the requirement that an evaluation shall take place at least every three years or sooner if there is a major change.</p> <p>* Record review: 12 out of 12 training system efficiency evaluation records covering the periods from July 2019 to June 2020 (latest one date on June 30, 2020) indicate that the facility has evaluated their training system efficiency.</p> <p>* Record review: 12 out of 12 corrective action plans covering the period of July 2019 to June 2020 demonstrate the effectiveness evaluation is conducted annually to evaluate the training program.</p> <p>* Management Interview: Ms. Valerie Xiao/Production Management System Engineer state that facility provides orientation and annual refreshing training to all new employees / workers by HR department, the position training lead by department, special operator and management training lead by top management and special agencies through their internal training management system, the facility management communicates the policies / procedures to the workers through bulletin board where updates or for refreshing. Also, the facility evaluates their training system efficiency annually and the results are positive.</p> <p>* Workers Interview: 70 out of 70 workers state that they are trained on facility policy / procedure / job related aspects and performance target related to A) Labor C) Environment and D) Ethics management system on orientation training and annual refresher training, for each training they need to pass the test and they all report the training program is effective. They are trained on the RBA code awareness annually, the latest training date is June 30, 2020.</p> <p>* Supporting evidence reference(s): N/A</p>
COMMUNICATION	
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 and D) Ethics policies practices and performance is established.
Data points	<p>* Record review: Internal and External Communication Control Procedure (Doc. No.: SHZ-SAP-19, Rev. 02 Issue date: January 3, 2018) 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) list of labor agents / contractors with percentage of workforce, d.a.c) costs to workers d.a.c.a) in total absolute numbers d.a.c.b) per contract base d.a.d) labor agent/contractor fees 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: 12 out of 12 communications to workers and managers covering the period of July 2019 to June 2020 demonstrate consistent implementation of communication control procedure.</p> <p>* Record review: 160 out of 160 communications with suppliers covering the period of July 2019 to June 2020 demonstrate consistent implementation of communication control procedure.</p> <p>* Record review: 2 out of 2 communications with customers covering the period of July 2019 to June 2020 demonstrate consistent implementation of communication control procedure.</p> <p>* Record review: 12 out of 12 communication effectiveness evaluations covering the period July 2017 to June 2020 demonstrate consistent implementation of communication control procedure.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer confirm 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: 70 out of 70 workers a) confirm when the last communication was 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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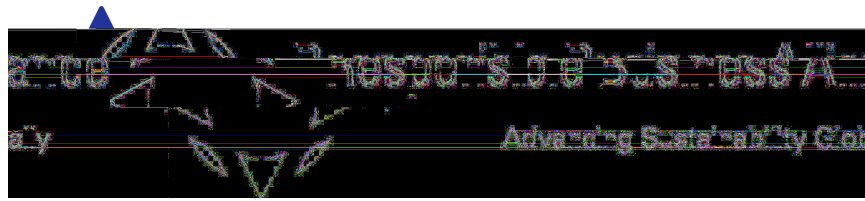
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WORKER FEEDBACK AND PARTICIPATION	
Question #	VAP-E8.1
Question Text	An adequate and effective grievance/complaint process where work-related and Code-related grievances or complaints without fear of reprisal or intimidation is established can be confidentially 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.
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(s) b.b) visible.</p> <p>* Record review: Employee feedback and participation control procedure (Doc No. SHZ-SAP-06, Rev. A2, Issue date: May 8, 2020) 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 Whistleblowers c) clear grievance channels so c.a) anyone is comfortable reporting grievances c.b) reporting is encouraged. d) of investigation e) 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: 12 out of 12 grievance and complaints records covering the period of July 2019 to June 2020 demonstrate grievance/complaint records are available for a period of at least 12 months.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states what grievance and complaint mechanisms are in place b) explains how these are 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) confirm how the identity of the person who files a grievance is protected f) explain how the procedure on grievance mechanisms are externally communicated g) confirm the number of reported cases the stage had on discrimination h) states how the cases were effectively resolved.</p> <p>* Worker interview: 70 out of 70 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 e) state how management has responded to and resolved 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
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	<p>* Site observation: Feedback channels are clearly communicated and visible.</p> <p>* Record review: Employee feedback and participation control procedure (Doc No. SHZ-SAP-06, Rev. A2, Issue date: May 8, 2020) states the detailed process a) to obtain worker input and feedback b) promptly b.a) evaluate the validity of the any input of feedback b.b) take action if the input or feedback is valid.</p> <p>* Record review: 4 out of 4 input and feedback reports covering the period of July 2019 to June 2020 demonstrate suggestion records are available for a period of at least 12 months.</p> <p>* Management interview: Ms. Valerie Xiao/Production Management System Engineer a) explains what mechanisms management employs to seek worker feedback b) confirm when the last feedback was received c) details what information was obtained d) states what actions were taken as a result of the feedback.</p> <p>* Worker interview: 70 out of 70 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.</p> <p>* Supporting evidence reference(s): N/A</p>
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

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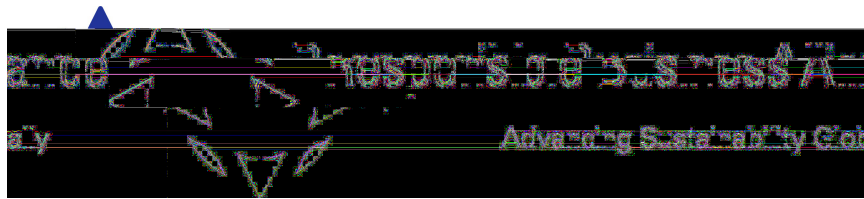
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Conclusion	An adequate and effective Audit process to periodically assess conformance with the RBA Code pertaining to: A) Labor and D) Ethics is in place.
Data points	<ul style="list-style-type: none"> * Record review: Internal audit control procedure (Doc. No.: SHZ-SAP-15, Rev. A2, Issue date: May 8, 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. * Record review: Internal audit report (Doc. No.: Nil, Rev. Nil, Issue date: March 16, 2020) covering the period of July 2019 to June 2020 demonstrates the consistent implementation of Internal Audit Control Procedure. The latest internal audit on A) Labor and D) Ethics is conducted on January 15-17, 2020. * Management interview: Ms. Valerie Xiao/Production Management System Engineer a) states which self-audit program is in place b) details what the last Audit was and its findings. * Supporting evidence reference(s): N/A
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 actions process to rectify and close Nonconformances for A) Labor and D) Ethics is established.
Data points	<ul style="list-style-type: none"> * Record review: Corrective actions and prevention control procedure (Doc. No.: SHZ-SAP-17, Rev. A2, Issue date: May 8, 2020) 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.g. confirmed by a management representative e.b) after verification by the appropriate person. * Record review: 16 out of 16 conformance corrective action plans covering the period of July 2019 to June 2020 demonstrate the consistent implementation of corrective actions and prevention control procedure. * Record review: No regulatory citations or violation notices are available for the past three years. * Management interview: Ms. Valerie Xiao/Production Management System Engineer: a) details The CAP process b) states the corrective actions that are currently being implemented c) confirm 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. * Supporting evidence reference(s): N/A
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.

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Data points	<p>* Record review: Supplier, subcontractor and retailer management procedure (Doc. No.: SHZ-SAP-17, Rev. A2, Issue date: January 3, 2020) 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 CMA a.b.b) or an AMA (done by a third-party RBA Qualified Audit Firm) 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.</p> <p>* Record review: 54 out of 54 Supplier Verification visit reports covering the period July 2019 to June 2020 demonstrate conformance with Supplier social responsibility management rule.</p> <p>* Record review: 54 out of 54 Supplier audits reports covering the period July 2019 to June 2020 demonstrate conformance with Supplier Social Responsibility Management Procedure.</p> <p>* Record review: 54 out of 54 Supplier corrective action plans including monitoring covering the period July 2019 to June 2020 demonstrate conformance with Supplier social responsibility management rule.</p> <p>* Record review: 2 out of 2 payrolls of workers from onsite sub-contractors providing catering/kitchen service for review, demonstrate those catering/kitchen workers are paid properly.</p> <p>* Record review: 2 out of 2 working hours records of workers from onsite sub-contractors providing catering/kitchen service for review, demonstrate the working hours for those catering/kitchen workers are within law requirement.</p> <p>* Management interview: Mr. Valerie Xiao/Production Management System Engineer a) states what evaluation method they use to assess the requirements of the code b) confirms how many Audits/evaluations have been conducted in the last year for their Suppliers c) details any use of desk-audit process in lieu of a full / on-site RBA audit d) describes progress on a risk-based approach to audits and assessment.</p> <p>* Supporting evidence reference(s): 1</p>
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MANAGEMENT SYSTEM PROVISION GOOD PRACTICES	
Question #	VAP-E13.1a
Question Text	Are there Management System provisions good practices
Rating	No
Conclusion	
Data points	

General Co. Information

GENERAL AUDITEE FACILITY INFORMATION	
Question #	VAP-Info1.1
Question Text	Auditee / Facility Name
Rating	VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD.
Conclusion	
Data points	

Question #	VAP-Info1.2
Question Text	Address
Rating	Xing Cheng science and Technology Park, Xinqiao Town, Huiyang District Huizhou, Guangdong
Conclusion	
Data points	

Question #	VAP-Info1.3
Question Text	Country
Rating	China
Conclusion	
Data points	

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Question #	VAP-Info1.3a
Question Text	GPS Coordinates of Facility Main entrance
Rating	N22.8166°, E114.5129°
Conclusion	
Data points	
Question #	VAP-Info1.4
Question Text	Facility Manager (Name & Title)
Rating	Mr. Chen Tao / President
Conclusion	
Data points	
Question #	VAP-Info1.5
Question Text	Main Contact(s) for Audit (Name & Title)
Rating	Mr. Steven Lim / Customer Service Engineering Director
Conclusion	
Data points	
Question #	VAP-Info1.6
Question Text	email
Rating	steven_lim@shpcb.com
Conclusion	
Data points	
Question #	VAP-Info1.7
Question Text	Telephone
Rating	86-752-3723668
Conclusion	
Data points	
Question #	VAP-Info1.8
Question Text	Auditee contact person who is authorized to approve and release the audit report: name
Rating	Mr. Steven Lim / Customer Service Engineering Director
Conclusion	
Data points	
Question #	VAP-Info1.9
Question Text	Auditee contact person who is authorized to approve and release the audit report: email
Rating	steven_lim@shpcb.com
Conclusion	
Data points	
Question #	VAP-Info1.10

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Question Text	Auditee contact person who is authorized to approve and release the audit report: phone
Rating	86-752-3723668
Conclusion	
Data points	
PRIMARY TYPES OF OPERATION	
Question #	VAP-Info5.1
Question Text	Primary types of Operation: Chemical (describe)
Rating	Hydrochloric acid, sulfuric acid, sodium hydroxide, alcohol, and etc.
Conclusion	
Data points	
SITE ACTIVITIES AND PROCESSES	
Question #	VAP-Info4.1
Question Text	Site Activities and Processes: Total facility surface area (square meters)
Rating	327483
Conclusion	
Data points	
POPULATION SIZE	
Question #	VAP-Info2.1
Question Text	Population Size: Number of male workers
Rating	3050
Conclusion	
Data points	
Question #	VAP-Info5.2
Question Text	Primary types of Operation: Mechanical (describe)
Rating	Cutting, coating, printing, drilling, printing, plating machines.
Conclusion	
Data points	
Question #	VAP-Info4.2
Question Text	Site Activities and Processes: Total roofed facility surface area (square meters)
Rating	236000
Conclusion	
Data points	
Question #	VAP-Info2.2
Question Text	Population Size: Number of female workers
Rating	1597
Conclusion	
Data points	

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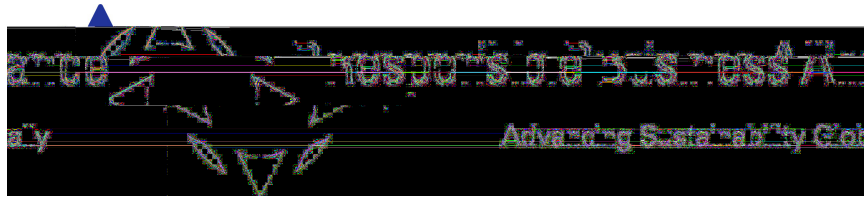
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Question #	VAP-Info4.3
Question Text	Site Activities and Processes: Number of production buildings (describe)
Rating	Two 3-storey, two 7-storey, one 2-storey production buildings, one 3-storey warehouse building, one 6-storey and one 9-storey dormitory buildings.
Conclusion	
Data points	
Question #	VAP-Info5.3
Question Text	Primary types of Operation: Finishing (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info2.3
Question Text	Population Size: Number of total workers
Rating	4647
Conclusion	
Data points	
POPULATION CHARACTERISTICS	
Question #	VAP-Info3.3
Question Text	Population Characteristics: Number of total workers under 18 years of age
Rating	0
Conclusion	
Data points	
Question #	VAP-Info2.3a
Question Text	Population Size: Number of male production supervisors
Rating	1125
Conclusion	
Data points	
Question #	VAP-Info5.4
Question Text	Primary types of Operation: Assembly (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.5
Question Text	Site Activities and Processes: Component manufacturing(describe)
Rating	Cutting, pre-treatment, coating, exposure, brown oxidation-pre-lay up, lamination, drilling, CNC, drilling, deburring, developing, printing, inspection, packing.
Conclusion	

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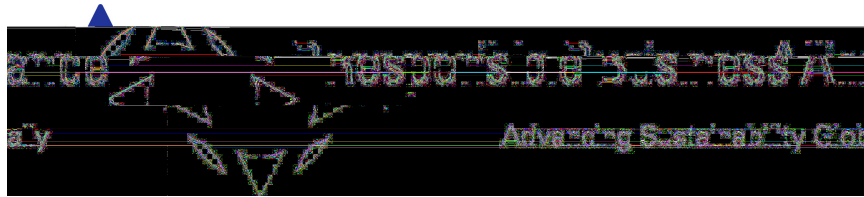
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Data points	
Question #	VAP-Info2.3b
Question Text	Population Size: Number of female production supervisors
Rating	178
Conclusion	
Data points	
Question #	VAP-Info5.5
Question Text	Primary types of Operation: Other (describe)
Rating	N/A
Conclusion	
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	N/A
Conclusion	
Data points	
Question #	VAP-Info4.7
Question Text	Site Activities and Processes: Metal Stamping / plating (describe)
Rating	51 sets of plating lines in the facility.
Conclusion	
Data points	
Question #	VAP-Info4.8
Question Text	Site Activities and Processes: PC Board manufacturing (describe)
Rating	51 sets of plating lines in the facility for PC Board manufacturing.
Conclusion	
Data points	
Question #	VAP-Info3.9
Question Text	Population Characteristics: Number of total temporary workers
Rating	0
Conclusion	
Data points	

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Question #	VAP-Info4.9
Question Text	Site Activities and Processes: Painting/coating (describe)
Rating	23 sets of coating machines in the facility.
Conclusion	
Data points	
Question #	VAP-Info3.10
Question Text	Population Characteristics: Number of male migrant workers
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.10
Question Text	Site Activities and Processes: Distribution/Logistics (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.11
Question Text	Site Activities and Processes: Clean room (describe)
Rating	4 ISO Class 5 clean rooms, 14 ISO Class 4 clean rooms and 9 ISO Class 3 clean rooms.
Conclusion	
Data points	
Question #	VAP-Info3.11
Question Text	Population Characteristics: Number of female migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info3.12
Question Text	Population Characteristics: Number of total migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.12
Question Text	Site Activities and Processes: Logistics & Distribution (describe)
Rating	N/A
Conclusion	
Data points	

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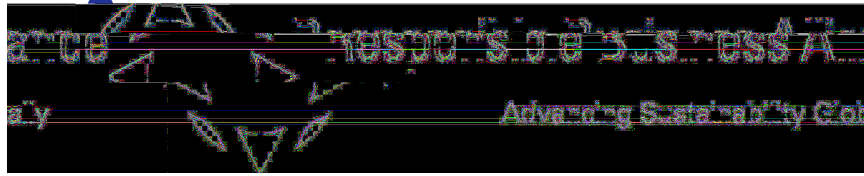
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Question #	VAP-Info4.13
Question Text	Site Activities and Processes: Business Services - Office Equipment (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.14
Question Text	Site Activities and Processes: Business Services - Branded Products (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info3.15
Question Text	Population Characteristics: Number of total indirect labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.15
Question Text	Site Activities and Processes: Business Services - Finance Related (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.16
Question Text	Site Activities and Processes: Business Services - HR Related (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info3.16
Question Text	Population Characteristics: Nationalities of migrant labor
Rating	0
Conclusion	
Data points	
Question #	VAP-Info3.17
Question Text	Population Characteristics: Language(s) spoken by workers
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.17

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Question Text	Site Activities and Processes: Legal Related (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.18
Question Text	Site Activities and Processes: Fleet Related (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info3.18
Question Text	Population Characteristics: Language(s) spoken by management
Rating	0
Conclusion	
Data points	
Question #	VAP-Info4.19
Question Text	Site Activities and Processes: Real Estate Construction (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.20
Question Text	Site Activities and Processes: Real Estate Maintenance (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.21
Question Text	Site Activities and Processes: Business Services - Real Estate Security (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.22
Question Text	Site Activities and Processes: Business Services - Facility Management (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.23
Question Text	Site Activities and Processes: Business Services - Rent/Lease (describe)

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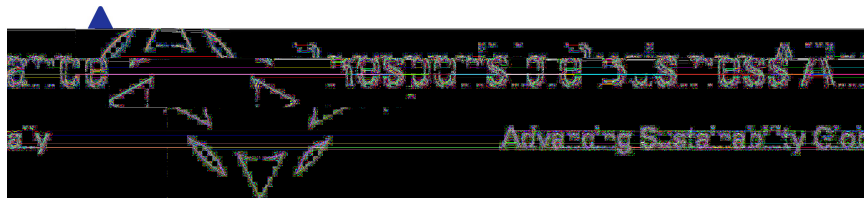
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Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.24
Question Text	Site Activities and Processes: Hardware - Product Related (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.25
Question Text	Site Activities and Processes: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

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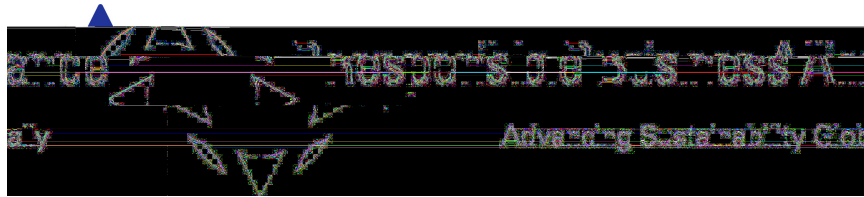
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Conclusion	
Data points	
Question #	VAP-Info4.31
Question Text	Site Activities and Processes: Professional Services - Contact Center (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.32
Question Text	Site Activities and Processes: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

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Data points	
Question #	VAP-Info4.38
Question Text	Site Activities and Processes: Telecom - Maintenance and Managed Services (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.39
Question Text	Site Activities and Processes: Telecom - Mobility (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.40
Question Text	Site Activities and Processes: Telecom - Voice and Data Transport (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.41
Question Text	Site Activities and Processes: Travel Related Services (describe)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info4.42
Question Text	Site Activities and Processes: Services / Other (describe)
Rating	N/A
Conclusion	
Data points	
ON-SITE SERVICES	
Question #	VAP-Info6.1
Question Text	On-Site Services: Fire brigade/warden team (description)
Rating	1 Fire brigade with 19 internally trained members.
Conclusion	
Data points	
Question #	VAP-Info6.2
Question Text	On-Site Services: Hospital/infirmary (description)
Rating	One infirmary with 3 doctors in the facility. The nearest hospital is around 6km away from the facility.
Conclusion	

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Data points	
Question #	VAP-Info6.3
Question Text	On-Site Services: Chemical Spill Response Team (description)
Rating	7 internally trained chemical spill response team members.
Conclusion	
Data points	
Question #	VAP-Info6.4
Question Text	On-Site Services: Wastewater treatment type (description)
Rating	Wastewater treated via pH adjustment, coagulation, flocculation, precipitation, pH adjustment, aerobic treatment, membrane bioreactor, sterilization, reverse osmosis and 60% treated wastewater recycled to surface cleaning process and 40% discharged to municipal wastewater drainage.
Conclusion	
Data points	
Question #	VAP-Info6.5
Question Text	On-Site Services: Power Generation (description)
Rating	Two sets of diesel generators installed in the generator room.
Conclusion	
Data points	
Question #	VAP-Info6.6
Question Text	On-Site Services: Dormitory (# people + description)
Rating	One 6-storey and one 9-storey dormitory buildings prepared for 2100 workers and two dormitories prepared for 300 management personnel.
Conclusion	
Data points	
Question #	VAP-Info6.7
Question Text	On-Site Services: Canteen (description)
Rating	One canteen is located on 1F of the 6-storey dormitory building for workers. One canteen is located on 1F of the 9-storey dormitory building for management.
Conclusion	
Data points	
Question #	VAP-Info6.8
Question Text	On-Site Services: Kitchen (description)
Rating	One kitchen and one canteen are located on 1F of the 6-storey dormitory building for workers. The other kitchen and canteen are located on 1F of the 9-storey dormitory building for management. Two licensed catering vendors provide cooking activity and catering service.
Conclusion	
Data points	
Question #	VAP-Info6.9

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Question Text	On-Site Services: Recycling (description)
Rating	Carton, wastewater.
Conclusion	
Data points	

Question #	VAP-Info6.10
Question Text	On-Site Services: Other (description)
Rating	N/A
Conclusion	
Data points	

CERTIFICATIONS

Question #	VAP-Info7.0
Question Text	Please list all current certifications relating to labor, ethics, env8e Services: Other (description)

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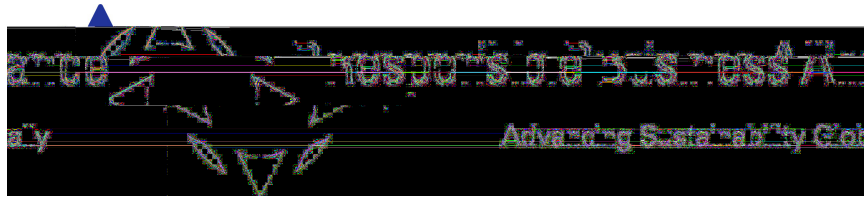
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Question #	VAP-Info17.1
Question Text	Other consulting services used in last 3 years: Consulting description of work
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info17.2
Question Text	Other consulting services used in last 3 years: Consulting firm (name and address)
Rating	N/A
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	N/A
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	N/A
Conclusion	
Data points	
AUDIT TEAM: LEAD AUDITOR	
Question #	VAP-Info18.1
Question Text	Lead Auditor Name
Rating	Tomy Cai
Conclusion	
Data points	
Question #	VAP-Info18.2
Question Text	Lead Auditor Email
Rating	Hanfu.cai@greenment.net
Conclusion	
Data points	
Question #	VAP-Info18.3
Question Text	Lead Auditor Phone
Rating	86-13823754991
Conclusion	
Data points	

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Question #	VAP-Info18.4
Question Text	Lead Auditor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info18.5
Question Text	Auditor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info18.6
Question Text	Audit Firm APSCA Registration Number
Rating	N/A
Conclusion	
Data points	
LABOR AUDITOR	
Question #	VAP-Info19.1
Question Text	Labor Auditor Name
Rating	Tomy Cai
Conclusion	
Data points	
Question #	VAP-Info19.2
Question Text	Labor Auditor Email
Rating	Hanfu.cai@greenment.net
Conclusion	
Data points	
Question #	VAP-Info19.3
Question Text	Labor Auditor Phone
Rating	86-13823754991
Conclusion	
Data points	
ETHICS AUDITOR	
Question #	VAP-Info20.1
Question Text	Ethics Auditor Name
Rating	Tomy Cai
Conclusion	
Data points	

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Question #	VAP-Info20.2
Question Text	Ethics Auditor Email
Rating	Hanfu.cai@greenment.net
Conclusion	
Data points	
Question #	VAP-Info20.3
Question Text	Ethics Auditor Phone
Rating	86-13823754991
Conclusion	
Data points	
HEALTH AND SAFETY AUDITOR	
Question #	VAP-Info21.1
Question Text	Health and Safety Auditor Name
Rating	Jerry Chen
Conclusion	
Data points	
Question #	VAP-Info21.2
Question Text	Health and Safety Auditor Email
Rating	angming.chen@greenment.net
Conclusion	
Data points	
Question #	VAP-Info21.3
Question Text	Health and Safety Auditor Phone
Rating	86-13145995500
Conclusion	
Data points	
ENVIRONMENT AUDITOR	
Question #	VAP-Info22.1
Question Text	Environment Auditor Name
Rating	Jerry Chen
Conclusion	
Data points	
Question #	VAP-Info22.2
Question Text	Environment Auditor Email
Rating	angming.chen@greenment.net
Conclusion	

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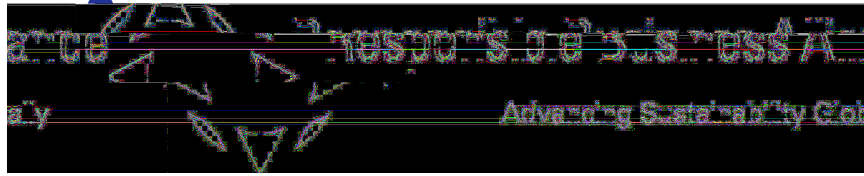
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Data points	
Question #	VAP-Info22.3
Question Text	Environment Auditor Phone
Rating	86-13145995500
Conclusion	
Data points	
MANAGEMENT SYSTEMS AUDITOR	
Question #	VAP-Info23.1
Question Text	Management Systems Auditor Name
Rating	Tomy Cai
Conclusion	
Data points	
Question #	VAP-Info23.2
Question Text	Management Systems Auditor Email
Rating	Hanfu.cai@greenment.net
Conclusion	
Data points	
Question #	VAP-Info23.3
Question Text	Management Systems Auditor Phone
Rating	86-13823754991
Conclusion	
Data points	
STAFF INTERVIEWS	
Question #	VAP-Info24.1
Question Text	Total number of interviews
Rating	70
Conclusion	
Data points	
Question #	VAP-Info24.2
Question Text	Total number of interviews (male)
Rating	46
Conclusion	
Data points	
Question #	VAP-Info24.3
Question Text	Total number of interviews (female)
Rating	24

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Conclusion	
Data points	
Question #	VAP-Info24.4
Question Text	Total number of interviews (direct workers)
Rating	70
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	58
Conclusion	
Data points	
Question #	VAP-Info24.7
Question Text	Total number of interviews (foreign migrant workers)
Rating	0
Conclusion	
Data points	
Question #	VAP-Info24.8
Question Text	Total number of group interviews
Rating	35
Conclusion	
Data points	
Question #	VAP-Info24.9
Question Text	Total number of individual interviews
Rating	35
Conclusion	
Data points	
TOTAL INTERVIEWS	
Question #	VAP-Info28.9
Question Text	Total interviews: Percentage of workforce (total)
Rating	1.5%

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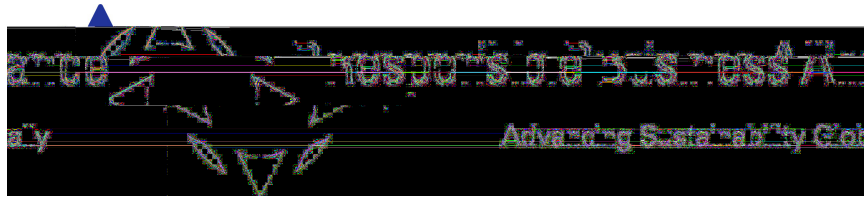
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Conclusion	
Data points	
MINIMUM NUMBER OF INTERVIEWS TO BE CARRIED OUT IN THIS AUDIT	
Question #	VAP-Info29.1
Question Text	Minimum number of interviews to be carried out in this audit
Rating	69
Conclusion	
Data points	
PROCESS AND SUMMARY	
Question #	VAP-Info30.1
Question Text	Process and summary: Management attitude
Rating	The management team show a cooperative attitude to the audit. They allow auditors to tour all the areas and conduct worker interviews. The management admit all the non-conformances found in the audit and promise to take corrective and preventative actions to ensure the compliance with RBA Code of Conduct requirements.
Conclusion	
Data points	
Question #	VAP-Info30.2
Question Text	Process and summary: Worker attitude
Rating	The facility allows auditors to conduct group and individual interviews confidentially. Workers are chosen within the whole facility freely without any interference from the facility management. Auditors select 70 workers from different positions, gender and ages and the interviews are conducted in both workshops and meeting room without being interrupted. All workers are open and cooperative.
Conclusion	
Data points	
Question #	VAP-Info30.3
Question Text	Process and summary: Process Integrity
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info30.4
Question Text	Process and summary: Closing meeting
Rating	A closing meeting is held at 15:50 on July 17, 2020 with the auditee management. Mr. Steven Lim / Customer Service Engineering Director, Ms. Zhang Minna / System Manager, Ms. Valerie Xiao / Production Management System Engineer, Ms. Li Bo / Safety Engineer, Mr. Jianping Jia / Safety Engineer, Ms. Shaofang Xu / Environmental Supervisor and other management attend the close meeting. The audit results have been reviewed with and agreed by the management during the closing meeting.
Conclusion	
Data points	
Question #	VAP-Info30.5
Question Text	Process and summary: Exception management

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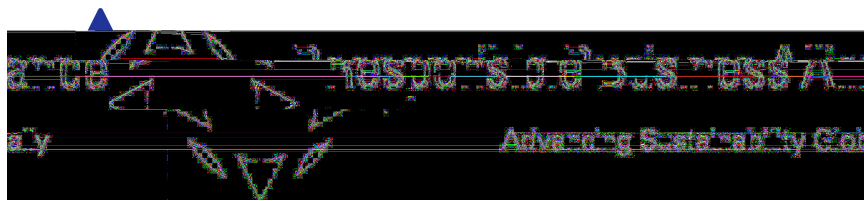
Rating	N/A
Conclusion	
Data points	
Question #	VAP-Info30.6
Question Text	Process and summary: Legal Nonconformance Risks

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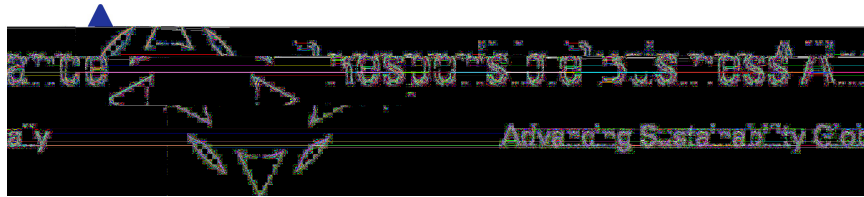
Rating

There are total 7 legal nonconformance risks. Labor: A3.1 Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours. a) Between 72 h/workweek and 84 h/workweek: a.a) Average = 1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) = 0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours. d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours. [PRC Labor Law article 41, effective from December 29, 2018, the employer 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. / 《中华人民共和国劳动法》第41条2018年12月29日实施, 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。] A3.2 Workers do not receive at least one day off every seven days. There is no obvious peak or non-peak month in the factory. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled. The longest consecutive working days are 22 days worked a) Between 12 and 24 consecutive days worked: a.a) Average = 1.9% with a highest of 22 consecutive days worked a.b) June 2019 (random month) = 6% with a highest of 22 consecutive days worked a.c) For April 2020 (random) = 0% a.d) For May 2020 (random) = 0% b) Between 7 and 12 consecutive days worked: b.a) Average = 6.7% with a highest of 9 consecutive days worked b.b) June 2019 (random month) = 20% with a highest of 9 consecutive days worked b.c) April 2020 (random) = 0% b.d) May 2020 (random) = 0% [The Labor Law of the PRC, article 38, effective from December 29, 2018, Employing units are to guarantee that employees have at least one day off a week. / 《中华人民共和国劳动法》第38条, 2018年12月29日生效, 用人单位应当保证劳动者每周至少休息一天。] A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is RMB1550, instead of the workers' average income of previous year. [The Notice about The Standardized Requirement of Social Insurance Contribution Base ([2006]60): effective date: November 15, 2006, In the principle, the worker in the unit should pay the endowment insurance based on him-self's average monthly wage of the previous year. The base for the unit to pay for medical insurance, unemployment insurance, industrial injury insurance, and maternity insurance are the workers' total wage of the previous year. For the individual contribution of medical insurance and unemployment insurance, the base is the worker's monthly salary, it is calculated based on average wage of last 12 months for convenience. 《劳社险中心函[2006]160号》, 生效时间: 2006年11月15号, 单位职工本人缴纳基本养老保险费的基数原则上以上一年度本人月平均工资为基础, 参保单位缴纳基本医疗保险、失业保险、工伤保险、生育保险费的基数为职工工资总额, 基本医疗保险、失业保险职工个人缴费基数为本人工资, 为便于征缴可以以上一年度个人月平均工资为缴费基数。] Health & Safety: B1.b 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, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 2-storey production building. [Management Rules on Completion Acceptance Filing for Building Constructions and Municipal Infrastructure, Engineering (2009), article 4, The construction unit should register with the construction administrative department of the local people's government at or above the county level where the project is located within 15 days from the date of the completion acceptance of the project and in accordance with the provisions of these measures. / 《房屋建筑和市政基础设施工程竣工验收备案管理办法》(2009), 第四条, 建设单位应当自工程竣工验收合格之日起15日内, 依照本办法规定, 向工程所在地的县级以上地方人民政府建设行政主管部门(以下简称备案机关)备案。] B2.1b 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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. [Interim Provisions on the Administration of Examination

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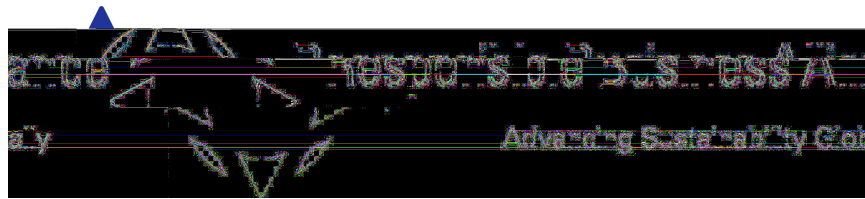
	<p>wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices. / 《生产设备安全卫生设计总则》第6.1.6条：以操作人员的位置所在平面为基准，凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位，都必须设置安全防护装置。] Environment: C3.1b Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. [Regulation for Safety of Dangerous Chemical. Article 20, units that produce, store and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, fire fighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely./ 《危险化学品安全管理条例》第二十条, 生产、储存、使用危险化学品的，应当根据危险化学品的种类、特性，在车间、库房等作业场所设置相应的监测、通风、防晒、调温、防火、灭火、防爆、泄压、防毒、消毒、中和、防潮、防雷、防静电、防腐、防渗漏、防护围堤或者隔离操作等安全设施、设备，并按照国家标准和国家有关规定进行维护、保养，保证符合安全运行要求。]</p>
Conclusion	
Data points	
Question #	VAP-Info30.7
Question Text	Process and summary: Executive summary

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<p>Rating</p>	<p>The validated initial audit of VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD. evaluates the facility's labor, ethics, occupational health & safety and environmental practices, and supporting management systems against the RBA audit criteria as contained in the RBA audit protocol 6.1.0 and applicable laws and regulations. The audit takes place on July 14 to 17, 2020. 2 RBA Auditors spend a total 8 person-days on site. It is a full scope audit of all manufacturing buildings and common spaces. No integrity issues are encountered during the audit. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. The findings include 7 Major non-conformances and 1 Minor non-conformance against the audit criteria.</p> <p>Summary of Major non-conformances: Labor: A3.1 Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours. a) Between 72 h/workweek and 84 h/workweek: a.a) Average =1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) =0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 96.5 h/m. d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours.</p> <p>A3.3 Adequate 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. However, the working hours control system are not effectively implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that major non-conformance in A3.1 and 1 minor non-conformance in A3.2 are detected.</p> <p>A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year.</p> <p>Health & Safety: B1.1b Environment: 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, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production building. B2.1b 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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. B6.2b Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1.</p> <p>Environment: C3.1b Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building.</p>
<p>Conclusion</p>	
<p>Data points</p>	

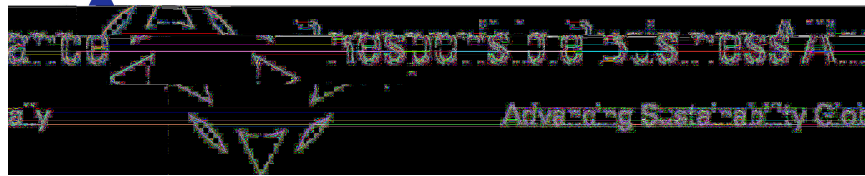
Info Section Details

GENERAL AUDITEE FACILITY INFORMATION		
Question #	Question Text	Answer
VAP-Info1.1	Auditee / Facility Name	VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD.
VAP-Info1.2	Address	Xing Cheng science and Technology Park, Xinqiao Town, Huiyang District, Huizhou, Guangdong
VAP-Info1.3	Country	China

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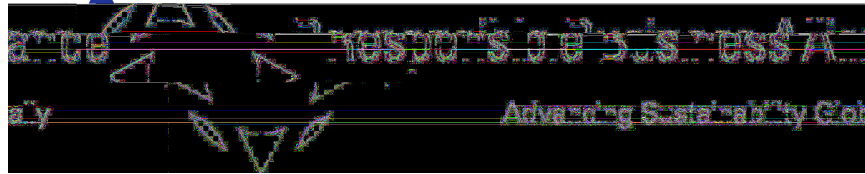
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VAP-Info1.3a	GPS Coordinates of Facility Main entrance	N22.8166°, E114.5129°
VAP-Info1.4	Facility Manager (Name & Title)	Mr. Chen Tao / President
VAP-Info1.5	Main Contact(s) for Audit (Name & Title)	Mr. Steven Lim / Customer Service Engineering Director
VAP-Info1.6	email	steven_lim@shpcb.com
VAP-Info1.7	Telephone	86-752-3723668
VAP-Info1.8	Auditee contact person who is authorized to approve and release the audit report: name	Mr. Steven Lim / Customer Service Engineering Director
VAP-Info1.9	Auditee contact person who is authorized to approve and release the audit report: email	steven_lim@shpcb.com
VAP-Info1.10	Auditee contact person who is authorized to approve and release the audit report: phone	86-752-3723668
PRIMARY TYPES OF OPERATION		
Question #	Question Text	Answer
VAP-Info5.1	Primary types of Operation: Chemical (describe)	Hydrochloric acid, sulfuric acid, sodium hydroxide, alcohol, and etc.
SITE ACTIVITIES AND PROCESSES		
Question #	Question Text	Answer
VAP-Info4.1	Site Activities and Processes: Total facility surface area (square meters)	327483
POPULATION SIZE		
Question #	Question Text	Answer
VAP-Info2.1	Population Size: Number of male workers	3050
VAP-Info5.2	Primary types of Operation: Mechanical (describe)	Cutting, coating, printing, drilling, printing, plating machines.
VAP-Info4.2	Site Activities and Processes: Total roofed facility surface area (square meters)	236000
VAP-Info2.2	Population Size: Number of female workers	597
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)	Two 3-storey, two 7-storey, one 2-storey production buildings, one 3-storey warehouse building, one 6-storey and one 9-storey dormitory buildings.
VAP-Info2.3	Population Size: Number of total workers	4647
VAP-Info5.3	Primary types of Operation: Finishing (describe)	N/A
VAP-Info5.4	Primary types of Operation: Assembly (describe)	N/A
VAP-Info2.3a	Population Size: Number of male production supervisors	1125
VAP-Info2.3b	Population Size: Number of female production supervisors	178
VAP-Info4.5	Site Activities and Processes: Component manufacturing (describe)	Cutting, pre-treatment, coating, exposure, brown oxidation-pre-treatment, lamination, drilling, CNC, drilling, deburring, developing, printing, inspection, packing.
VAP-Info5.5	Primary types of Operation: Other (describe)	N/A
VAP-Info3.6	Population Characteristics: Number of total student workers/apprentices/interns:	0
VAP-Info4.6	Site Activities and Processes: Final Assembly (describe)	N/A
VAP-Info4.7	Site Activities and Processes: Metal Stamping / plating (describe)	51 sets of plating lines in the facility.
VAP-Info4.8	Site Activities and Processes: PC Board manufacturing (describe)	51 sets of plating lines in the facility for PC Board manufacturing.
VAP-Info3.9	Population Characteristics: Number of total temporary workers	0
VAP-Info4.9	Site Activities and Processes: Painting/coating (describe)	23 sets of coating machines in the facility.
VAP-Info4.10	Site Activities and Processes; Distribution/Logistics (describe)	N/A

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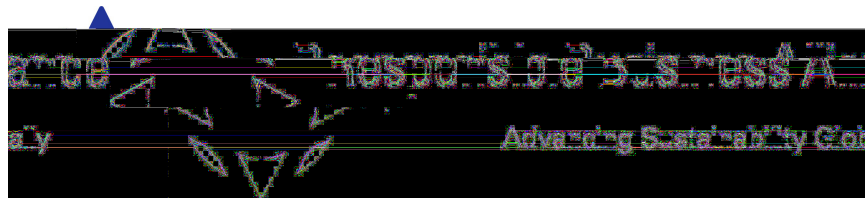
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VAP-Info3.10	Population Characteristics: Number of male migrant workers	0
VAP-Info4.11	Site Activities and Processes: Clean room (describe)	4 ISO Class 5 clean rooms, 14 ISO Class 4 clean rooms and 9 ISO Class 3 clean rooms.
VAP-Info3.11	Population 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)	N/A
VAP-Info4.13	Site Activities and Processes: Business Services - Office Equipment (describe)	N/A
VAP-Info4.14	Site Activities and Processes: Business Services - Branded Products (describe)	N/A
VAP-Info4.15	Site Activities and Processes: Business Services - Finance Related (describe)	N/A
VAP-Info3.15	Population Characteristics: Number of total indirect labor	0
VAP-Info4.16	Site Activities and Processes: Business Services - HR Related (describe)	N/A
VAP-Info3.16	Population Characteristics: Nationalities of migrant labor	0
VAP-Info4.17	Site Activities and Processes: Legal Related (describe)	N/A
VAP-Info3.17	Population Characteristics: Language(s) spoken by workers	0
VAP-Info4.18	Site Activities and Processes: Fleet Related (describe)	N/A
VAP-Info3.18	Population Characteristics: Language(s) spoken by management	0
VAP-Info4.19	Site Activities and Processes: Real Estate Construction (describe)	N/A
VAP-Info4.20	Site Activities and Processes: Real Estate Maintenance (describe)	N/A
VAP-Info4.21	Site Activities and Processes: Business Services - Real Estate Security (describe)	N/A
VAP-Info4.22	Site Activities and Processes: Business Services - Facility Management (describe)	N/A
VAP-Info4.23	Site Activities and Processes: Business Services - Rent/Lease (describe)	N/A
VAP-Info4.24	Site Activities and Processes: Hardware - Product Related (describe)	N/A
VAP-Info4.25	Site Activities and Processes: Hardware - Maintenance Related (describe)	N/A
VAP-Info4.26	Site Activities and Processes: Hardware - Reseller/Distributor (describe)	N/A
VAP-Info4.27	Site Activities and Processes: Sales/Marketing Services (describe)	N/A
VAP-Info4.28	Site Activities and Processes: Printing Services (describe)	N/A
VAP-Info4.29	Site Activities and Processes: Printing Materials & Supplies (describe)	N/A
VAP-Info4.30	Site Activities and Processes: Professional Services - Consultant (describe)	N/A
VAP-Info4.31	Site Activities and Processes: Professional Services - Contact Center (describe)	N/A
VAP-Info4.32	Site Activities and Processes: Professional Services - Sales & Support (describe)	N/A
VAP-Info4.33	Site Activities and Processes: Technology Outsourced Services (describe)	N/A
VAP-Info4.34	Site Activities and Processes: Contract Outside Labor (describe)	N/A
VAP-Info4.35	Site Activities and Processes: Software - Product/License (describe)	N/A
VAP-Info4.36	Site Activities and Processes: Software - Maintenance & Support (describe)	N/A
VAP-Info4.37	Site Activities and Processes: Software - Application Service Provider (describe)	N/A
VAP-Info4.38	Site Activities and Processes: Telecom - Maintenance and Managed Services (describe)	N/A
VAP-Info4.39	Site Activities and Processes: Telecom - Mobility (describe)	N/A
VAP-Info4.40	Site Activities and Processes: Telecom - Voice and Data Transport (describe)	N/A
VAP-Info4.41	Site Activities and Processes: Travel Related Services (describe)	N/A
VAP-Info4.42	Site Activities and Processes: Services / Other (describe)	N/A
ON-SITE SERVICES		
Question #	Question Text	Answer
VAP-Info6.1	On-Site Services: Fire brigade/warden team (description)	1 Fire brigade with 19 internally trained members.

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VAP-Info6.2	On-Site Services: Hospital/infirmary (description)	One infirmary with 3 doctors in the facility. The nearest hospital is around 6km away from the facility.
VAP-Info6.3	On-Site Services: Chemical Spill Response Team (description)	7 internally trained chemical spill response team members.
VAP-Info6.4	On-Site Services: Wastewater treatment type (description)	Wastewater treated via pH adjustment, coagulation, flocculation, precipitation, pH adjustment, aerobic treatment, membrane bioreactor, sterilization, reverse osmosis and 60% treated wastewater recycled to surface cleaning process and 40% discharged to municipal wastewater drainage.
VAP-Info6.5	On-Site Services: Power Generation (description)	Two sets of diesel generators installed in the generator room
VAP-Info6.6	On-Site Services: Dormitory (# people + description)	One 6-storey and one 9-storey dormitory buildings prepared for 2100 workers and two dormitories prepared for 300 management personnel.
VAP-Info6.7	On-Site Services: Canteen (description)	One canteen is located on 1F of the 6-storey dormitory building for workers. One canteen is located on 1F of the 9-storey dormitory building for management.
VAP-Info6.8	On-Site Services: Kitchen (description)	One kitchen and one canteen are located on 1F of the 6-storey dormitory building for workers. The other kitchen and canteen are located on 1F of the 9-storey dormitory building for management. Two licensed catering vendors provide cooking activity and catering service.
VAP-Info6.9	On-Site Services: Recycling (description)	Carton, wastewater.
VAP-Info6.10	On-Site Services: Other (description)	N/A

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.	Environment: Certification of ISO14001:2015 (certificate number: EM8646212, Issue date: March 31, 2019, Expiry date: March 30, 2022, issued by: BSI) Health & safety: Certification of ISO45001:2018 (certificate number: QMS46213, Issue date: March 31, 2019, Expiry date: March 30, 2022, issued by: BSI)

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.	No

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	N/A

OTHER CONSULTING SERVICES USED IN LAST 3 YEARS

Question #	Question Text	Answer
VAP-Info17.0	Used Other consulting services in the last 3 years	N/A
VAP-Info17.1	Other consulting services used in last 3 years: Consulting description of work	N/A
VAP-Info17.2	Other consulting services used in last 3 years: Consulting firm (name and address)	N/A
VAP-Info17.3	Other consulting services used in last 3 years: Consulting started on (date - dd/mm/yyyy)	N/A
VAP-Info17.4	Other consulting services used in last 3 years: Consulting ended on (date - dd/mm/yyyy)	N/A

AUDIT TEAM: LEAD AUDITOR

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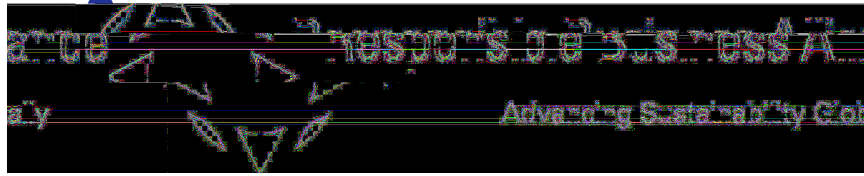
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Question #	Question Text	Answer
VAP-Info18.1	Lead Auditor Name	Tomy Cai
VAP-Info18.2	Lead Auditor Email	Hanfu.cai@greenment.net
VAP-Info18.3	Lead Auditor Phone	86-13823754991
VAP-Info18.4	Lead Auditor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)	N/A
VAP-Info18.5	Auditor APSCA Registration Number (RA 217xxxxx or ASCA 217xxxxxx)	N/A
VAP-Info18.6	Audit Firm APSCA Registration Number	N/A
LABOR AUDITOR		
Question #	Question Text	Answer
VAP-Info19.1	Labor Auditor Name	Tomy Cai
VAP-Info19.2	Labor Auditor Email	Hanfu.cai@greenment.net
VAP-Info19.3	Labor Auditor Phone	86-13823754991
ETHICS AUDITOR		
Question #	Question Text	Answer
VAP-Info20.1	Ethics Auditor Name	Tomy Cai
VAP-Info20.2	Ethics Auditor Email	Hanfu.cai@greenment.net
VAP-Info20.3	Ethics Auditor Phone	86-13823754991
HEALTH AND SAFETY AUDITOR		
Question #	Question Text	Answer
VAP-Info21.1	Health and Safety Auditor Name	Jerry Chen
VAP-Info21.2	Health and Safety Auditor Email	angming.chen@greenment.net
VAP-Info21.3	Health and Safety Auditor Phone	86-13145995500
ENVIRONMENT AUDITOR		
Question #	Question Text	Answer
VAP-Info22.1	Environment Auditor Name	Jerry Chen
VAP-Info22.2	Environment Auditor Email	angming.chen@greenment.net
VAP-Info22.3	Environment Auditor Phone	86-13145995500
MANAGEMENT SYSTEMS AUDITOR		
Question #	Question Text	Answer
VAP-Info23.1	Management Systems Auditor Name	Tomy Cai
VAP-Info23.2	Management Systems Auditor Email	Hanfu.cai@greenment.net
VAP-Info23.3	Management Systems Auditor Phone	86-13823754991
STAFF INTERVIEWS		
Question #	Question Text	Answer
VAP-Info24.1	Total number of interviews	70
VAP-Info24.2	Total number of interviews (male)	46
VAP-Info24.3	Total number of interviews (female)	24
VAP-Info24.4	Total number of interviews (direct workers)	70
VAP-Info24.5	Total number of interviews (indirect workers)	0
VAP-Info24.6	Total number of interviews (shift workers)	58
VAP-Info24.7	Total number of interviews (foreign migrant workers)	0
VAP-Info24.8	Total number of group interviews	35
VAP-Info24.9	Total number of individual interviews	35

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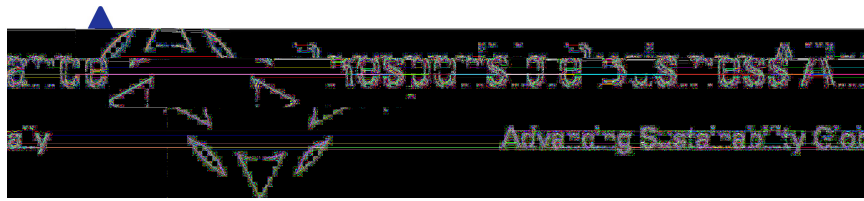
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TOTAL INTERVIEWS		
Question #	Question Text	Answer
VAP-Info28.9	Total interviews: Percentage of workforce (total)	1.5%
MINIMUM NUMBER OF INTERVIEWS TO BE CARRIED OUT IN THIS AUDIT		
Question #	Question Text	Answer
VAP-Info29.1	Minimum number of interviews to be carried out in this audit	69
PROCESS AND SUMMARY		
Question #	Question Text	Answer
VAP-Info30.1	Process and summary: Management attitude	The management team show a cooperative attitude to the audit. They allow auditors to tour all the areas and conduct worker interviews. The management admit all the non-conformances found in the audit and promise to take corrective and preventative actions to ensure the compliance with RBA Code of Conduct requirements.
VAP-Info30.2	Process and summary: Worker attitude	The facility allows auditors to conduct group and individual interviews confidentially. Workers are chosen within the whole facility freely without any interference from the facility management. Auditors select 70 workers from different positions, gender and ages and the interviews are conducted in both workshops and meeting room without being interrupted. All workers are open and cooperative.
VAP-Info30.3	Process and summary: Process Integrity	N/A
VAP-Info30.4	Process and summary: Closing meeting	A closing meeting is held at 15:50 on July 17, 2020 with the auditee management. Mr. Steven Lim / Customer Service Engineering Director, Ms. Zhang Minna / System Manager, Ms. Valerie Xiao / Production Management System Engineer, Ms. Li Bo / Safety Engineer, Mr. Jianping Jia / Safety Engineer, Ms. Shaofang Xu / Environmental Supervisor and other management attend the closing meeting. The audit results have been reviewed with and agreed by the management during the closing meeting.
VAP-Info30.5	Process and summary: Exception management	N/A

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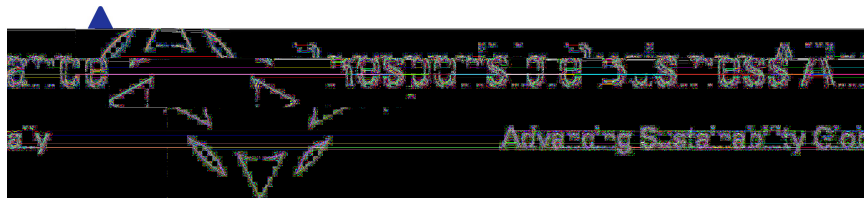
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<p>VAP-Info30.6</p>	<p>Process and summary: Legal Nonconformance Risks</p>	<p>There are total 7 legal nonconformance risks. Labor:</p> <p>A3.1 Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours. a) Between 72 h/workweek and 84 h/workweek: a.a) Average =1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 3.2 % with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) =0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours. d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours d.b) June 2019 (random) = 2.9% with highest of 4.5 hours d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours. [PRC Labor Law article 41, effective from December 29, 2018, the employer 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. 《中华人民共和国劳动法》第41条2018年12月29日实施: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。] A3.2 Workers do not receive at least one day off every seven days. There is no obvious peak or non-peak month in the factory. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled. The longest consecutive working days are 22 days worked a) Between 12 and 24 consecutive days worked: a.a) Average = 1.9% with a highest of 22 consecutive days worked a.b) June 2019 (random month) = 6% with a highest of 22 consecutive days worked a.c) For April 2020 (random) = 0% a.d) For May 2020 (random) = 0% b) Between 7 and 12 consecutive days worked: b.a) Average =6.7% with a highest of 9 consecutive days worked b.b) June 2019 (random month) = 20% with a highest of 9 consecutive days worked b.c) April 2020 (random) = 0% b.d) May 2020 (random) = 0% [The Labor Law of the PRC, article 38, effective from December 29, 2018, Employing units are to guarantee that employees have at least one day off a week. / 《中华人民共和国劳动法》第38条, 2018年12月29日生</p>
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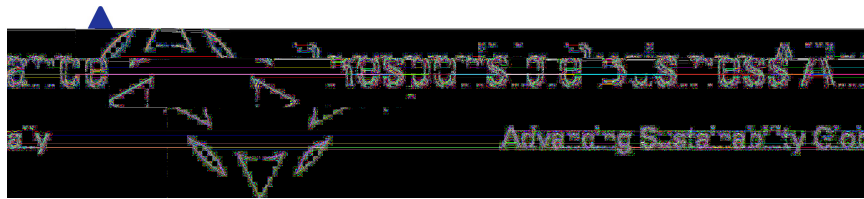
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	<p>Responsible Business Advancing Sustainability Goals</p>	<p>效,用人单位应当保证劳动者每周至少休息一天。] A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is RMB3376 per month for workers, and all employees' contribution base for maternity insurance and medical insurance is RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is RMB1550, instead of the workers' average income of previous year. [The Notice about The Standardized Requirement of Social Insurance Contribution Base ([2006]60): effective date: November 15, 2006, In the principle, the worker in the unit should pay the endowment insurance based on him-self's average monthly wage of the previous year. The base for the unit to pay for medical insurance, unemployment insurance, industrial injury insurance, and maternity insurance are the workers' total wage of the previous year. For the individual contribution of medical insurance and unemployment insurance, the base is the worker's monthly salary, it is calculated based on average wage of last 12 months for convenience. / 《劳社险中心函[2006]60号》, 生效时间: 2006年11月15号, 单位职工本人缴纳基本养老保险费的基数原则上以上一年度本人月平均工资为基础, 参保单位缴纳基本医疗保险、失业保险、工伤保险、生育保险的基数为职工工资总额, 基本医疗保险、失业保险职工个人缴费基数为本人工资, 为便于征缴可以以上一年度个人月平均工资为缴费基数。] Health & Safety: B1.1b 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. However, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production building. [Management Rules on Completion Acceptance Filing for Building Constructions and Municipal Infrastructure Engineering (2009) article 4, The construction unit should register with the construction administrative department of the local people's government at or above the county level where the project is located within 15 days from the date of the completion acceptance of the project and in accordance with the provisions of these measures. / 《房屋建筑和市政基础设施工程竣工验收备案管理办法》(2009) 第四条, 建设单位应当自工程竣工验收合格之日起15日内, 依照本办法规定, 向工程所在地的县级以上地方人民政府建设行政主管部门(以下简称备案机关)备案。] B2.1b 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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building. [Interim Provisions on the Administration of Examination and Acceptance of Fire Protection Design of Construction Projects (2020). article 33, Registration and spot check system is implemented for other construction projects. If other construction projects fail to pass the spot check according to law, they should be stopped from use; article 34, Within five working days from the other construction projects pass the completion acceptance, the</p>
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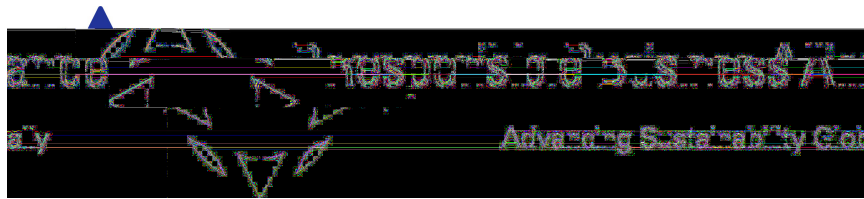
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	<p>Responsible Business Advancing Sustainability</p>	<p>construction unit should report to the fire design examination and acceptance competent department for registration./ 《建设工程消防设计审查验收管理暂行规定》(2020), 第三十三条, 对其他建设工程实行备案抽查制度。其他建设工程经依法抽查不合格的, 应当停止使用。第三十四条, 其他建设工程竣工验收合格之日起五个工作日内, 建设单位应当报消防设计审查验收主管部门备案。] B6.2b Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1. [Code of Design of Manufacturing Equipment Safety and Hygiene. Article 6.1.6, the external part or dangerous part of any transmission belts, rotational axis, transmission chain, coupling, belt wheel, gear, flying wheels, chain wheels and electric saw that is within 2 meters height of the plane where the operator is operating such device shall be equipped with safety devices./ 《生产设备安全卫生设计总则》第6.1.6条: 以操作人员的操作位置所在平面为基准, 凡高度在2m之内的所有传动带、转轴、传动链、联轴节、带轮、齿轮、飞轮、链轮、电锯等外露危险零部件及危险部位, 都必须设置安全防护装置。] Environment: C3.1b Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building. [Regulation for Safety of Dangerous Chemical. Article 20, units that produce, store and use the dangerous chemical should install related safety facilities in workshop or warehouse for monitor, ventilation, sun proof, air-condition, fire prevention, fire fighting, explosive prevention, pressure release, gas defense, antiseptis, counteract, anti-moisture, lighting proof, anti-static, anti-leakage, safeguard, and isolation. According to the national laws and requirements of dangerous chemical material, the above facilities and equipment should be kept and maintained safely./ 《危险化学品安全管理条例》第二十条, 生产、储存、使用危险化学品, 应当根据危险化学品的种类、特性, 在车间、库房等作业场所设置相应的监测、通风、防晒、调温、防火、防爆、泄压、防毒、消毒、中和、防潮、防雷、防静电、防腐、防渗漏、防护围堤或者隔离操作等安全设施、设备, 并按照国家标准和有关规定进行维护、保养, 保证符合安全运行要求。]</p>
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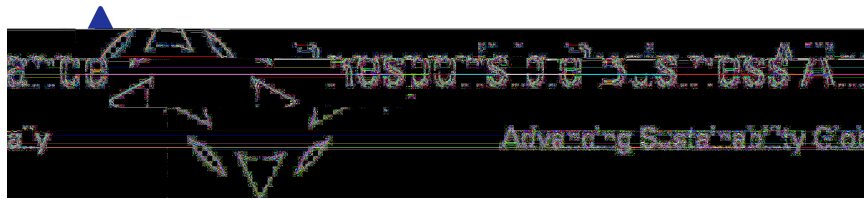
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<p>VAP-Info30.7</p>	<p>Process and summary: Executive summary</p>	<p>The validated initial audit of VICTORY GIANT TECHNOLOGY (HUI ZHOU) CO.,LTD. evaluates the facility's labor, ethics, occupational health & safety and environmental practices, and supporting management systems against the RBA audit criteria as contained in the RBA audit protocol 6.1.0 and applicable laws and regulations. The audit takes place on July 14 to 17, 2020. 2 RBA Auditors spend a total 8 person-days on site. It is a full scope audit of all manufacturing buildings and common spaces. No integrity issues are encountered during the audit. The audit findings are based on objective evidence gathered through management, staff and worker interviews, pertinent documents and records and workplace observations. The findings include 7 Major non-conformances and 1 Minor non-conformance against the audit criteria.</p> <p>Summary of Major non-conformances: Labor: A3.1 Hours worked in a workweek over the last 12 months exceed 60 hours. And monthly overtime exceeds legal limit of 36 hours per month. The months of June 2019 (random), April 2020 (random) and May 2020 (random) are sampled (there is no peak or low month in the facility). The highest weekly working hours are 73.5 h/workweek. Daily overtime working exceeds 3 hours, up to 4.5 hours.</p> <p>a) Between 72 h/workweek and 84 h/workweek: a.a) Average = 1 % with a highest of 73.5 h/workweek a.b) June 2019 (random) = 3% with highest of 73.5 a.c) April 2020 (random) = 0%; a.d) May 2019 (random) = 0%; b) Between 60 h/workweek and 72 h/workweek: b.a) Average = 9% with a highest of 71 h/workweek b.b) June 2019 (random) = 9% with highest of 71 h/workweek b.c) April 2020 (random) = 0.4% with a highest of 60.5 h/workweek b.d) May 2020 (random) = 0% c) Monthly overtime hours above the local law of 36 hours/month: c.a) average = 89.5% with a highest of 139.5 hours c.b) June 2019 (random) = 84% with highest of 139.5 hours c.c) April 2020 (random) = 94% with highest of 82.5 hours c.d) May 2020 (random) = 90% with highest of 90.5 hours. d) Daily overtime hours above the local law: d.a) average = 4.2% with a highest of 4.5 hours. d.b) June 2019 (random) = 2.9% with highest of 4.5 hours. d.c) April 2020 (random) = 4.3% with highest of 4.5 hours d.d) May 2020 (random) = 5.7% with highest of 4.5 hours.</p> <p>A3.3 Adequate 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. However, the working hours control system are ineffective implemented to ensure the workers' overtime hours meeting the legal and RBA code requirements that major non-conformance in A3.1 and Minor non-conformance in A3.2 are detected.</p> <p>A4.4 Deductions or withholdings are calculated correctly and submitted to the appropriate government agency within the local law time frame, however, 1 legal non-compliance is found, the contribution base of retirement insurance is local min legal limit of RMB3376 per month for workers, and all employees' contribution base for</p>
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	<p>Responsible Business Advancing Sustainability Globally</p>	<p>maternity insurance and medical insurance is local min legal limit of RMB3927, and all employees' contribution base for injury insurance and unemployment insurance is local min legal limit of RMB1550, instead of the workers' average income of previous year.</p> <p>Health& Safety:</p> <p>B1.1b Environment: 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, however, no structure safety approval is obtained for 1 block of 2-storey and 1 block of 7-storey production building.</p> <p>B2.1b 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, however, no fire safety acceptance approval is obtained for 1 block of 2-storey production building.</p> <p>B6.2b Machine-safeguarding program is implemented, and workers operate machinery safely. However, no protective cover is available for the rotational axis of 5 laser thickness gauge machines in lamination workshop on 1/F of production building #1.</p> <p>Environment:</p> <p>C3.1b Hazardous substances including wastes are properly categorized, labeled, handled, transported and disposed using government-approved and licensed vendors. However, no secondary containment is provided for 3 barrels of lubricating oil used in lamination workshop on 1/F of one 7-storey production building.</p>
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