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Factory ID number: P-111424

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Subject: **Summary of Findings - Supplier GBS Audit**

Zhejiang EGO Homeware Technology Co., Ltd. (P-111424)

1st Floor, Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China

Audit Cycle: Number of NBCU Audits 1

This report summarizes the findings of the Environment, Health and Safety Audit conducted at the facility of **Zhejiang EGO Homeware Technology Co., Ltd.** located at **1st Floor, Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China.**

The findings of the GBS Reviews were based upon a review of the documents furnished by **Zhejiang EGO Homeware Technology Co., Ltd.** and the observations obtained by **ESTS** on behalf of NBCUniversal during the Site visit on **June 2, 2023**. For the purpose of this audit, the facility of **Zhejiang EGO Homeware Technology Co., Ltd.** is referred to as the 'Site' in this report.

Guidance:

The GBS Assessment Report summarizes the Site audit findings and includes a corrective, and preventative action plan that both the Auditor and the Site Manager believe is reasonable to ensure conformity with the country specific and local laws.

NBCUniversal (NBCU) upholds a worldwide reputation for integrity and high standards of business conduct. NBCU Supplier Relationship Policy requires that we source only from Factories who comply with local laws and any applicable NBCU standards in such areas as labour, environment, health and safety. In order to ensure compliance with applicable laws and company policies, please provide evidence of closure on all open red findings within 90 days from receipt of report.

If you have any questions about the memorandum please contact Nicky Zhou / ESTS <Nicky.Zhou@estsglobal.com> and Itai Katsufumi-板井克文 / NBCUniversal <Katsufumi_Itai@usjc.co.jp>.

ESTS (on behalf of NBCUniversal)

Supplier General Information	
Name of Factory	Zhejiang EGOHomeware Technology Co., Ltd. 浙江艾拓家居用品科技有限公司
Physical Location Address	1 st Floor, Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China 中国浙江省金华市永康市东城街道百里西路 8 号第 2 幢一楼
Factory Contact Name(s)	Mr. Wenqiang Yang/Vice General Manager 杨文强/副总经理
Factory Contact Number/Email	Mobile: +86-182 6693 8855 Email: 575639775@qq.com
Official Factory Website	None
Waivers from Government	None
Certifications received from Government or other Companies.	None
Principle Products Manufactured	Stainless Steel Vacuum Cup
Annual Output of Products	Approximately 2 million pieces
Major Customers	Disney, Swell, 24bottles and K Coffee
Production Process	Tube Cutting, Metal Processing, Water Swelling, Washing, Welding, Polishing, Spray Painting, Powder Coating, Screen Printing, Heat Transfer Printing, Laser Marking, Assembling, Inspection and Packing
Factory Normal Working Days and Normal Work Hours	All departments run five days a week from Monday to Friday in one shift. Daily working hours during May to September: 07:00-11:00, 13:00-17:00 (8 hours per day); and Daily working hours during October to April of next year: 07:30-11:30, 13:00-17:00 (8 hours per day,).
Departments that run more than one shift	None
Peak Production Months	None
Number of Production Buildings	One 4-storey building
Canteen/Cafeteria Services	None
Dormitories	None
Security	Security guards of landlord and security facilities such as surveillance cameras are available to ensure security.
Overall findings	In view of findings raised, non-compliances were observed in the areas of Wages & Compensation, Fire Prevention/Emergency Response, Occupational Health & Safety, Environmental Conditions and Medical. Details of the findings are listed below. For all other areas, no violations or non-compliances were noted.
Findings	Total Findings 13 Black Flags - 0

	<p>Red Flags - 6</p> <p>Yellow Flags - 7</p>
Permits - the following government documents and permits were provided for review.	<ol style="list-style-type: none"> 1. Two Certificates of Safety Officers issued by Jinhua City Work Safety Supervision and Administration Bureau and Yongkang City Emergency Management Bureau in December 2020 and May 2023 respectively, both valid for 3 years; 2. Environmental Impact Assessment (EIA) Registration Form compiled by Zhejiang Zhili Environmental Protection Technology Co., Ltd. in May 2023; 3. Stationary Pollution Sources Discharge Registration Receipt obtained by the Site on March 20, 2023, valid until March 19, 2028; 4. Hazardous Wastes Disposal Contract signed with Lishui Minkang Health Medical Waste Treatment Co., Ltd. (hereinafter as "Minkang") for used chemical containers, waste activated carbons, paint residues, waste filter cotton, sludge, waste lubricant oil and waste hydraulic oil, valid until December 31, 2023; 5. Hazardous Waste Operation License of Minkang, valid until November 29, 2026; 6. Online Hazardous Waste Transfer Records for all above hazardous wastes in the past 12 months; 7. Industrial Hygiene (IH) Monitoring Report regarding Volatile Organic Compounds (VOCs), noise, dust, welding smoke and ultraviolet radiation issued by Zhejiang Gaoxin Safety Testing Technology Co., Ltd. on May 31, 2023; 8. 3 pre-job and 27 on-the-job Occupational Health Check-up Reports issued by Jinhua Tianshi Hospital Co., Ltd. during the past 12 months; 9. Special Equipment Registrations and Inspection Reports for 2 elevators, all within validity periods; 10. Work Permit of 1 electrician, within validity period; and 11. One First Aider Certificate issued by Yongkang City Red Cross Society in June 2022, valid for 3 years.
Audit Score Percentage and Audit Re-extension Status	<p>The audit score is 88%.</p> <p><i>NBCUniversal has implemented an audit performance scoring system for the purpose of granting extensions to the company's annual re-audit requirement. This score is used to calculate re-audit timing only and is <u>not</u> approval for production to commence.</i></p> <p><u>Audit Approval Extensions:</u></p> <ul style="list-style-type: none"> ○ <u>Extensions may be offered only if the factory has corrected and closed all findings.</u> NBCU discretion is allowed. Note all approval periods are from the audit date. ○ Below 85%= 12 month approval ○ 85%-92%= 18 month approval ○ 93% and above= 24 month approval <p><u>Production Authorization:</u></p> <ul style="list-style-type: none"> ○ If this is the initial audit of the factory production cannot commence <u>until all red flagged findings are addressed</u> and official notification is received from the NBCUniversal

	<i>business unit. Please note that production is not allowed until your factory has been approved and an NBCU approval letter is received.</i>
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Background

In October 2018, Zhejiang EGO Homeware Technology Co., Ltd. (浙江艾拓家居用品科技有限公司, hereinafter as the “Site”) was established at the rented premises: 2/F, Building 2, No. 125, Nanfeng Road, Industrial Functional Zone, Gushan Town, Yongkang City, Jinhua City, Zhejiang Province, China (中国浙江省金华市永康市古山镇工业功能分区南凤路 125 号第二幢二层). In December 2019, the Site moved to the previous rented premises: 2/F, No. 5, Haohu Road, Industrial Functional Zone, Gushan Town, Yongkang City, Jinhua City, Zhejiang Province, China (中国浙江省金华市永康市古山镇工业功能分区浩胡路 5 号第二层). In September 2022, the Site moved to the current rented premises: 1st Floor, Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China (中国浙江省金华市永康市东城街道百里西路 8 号第 2 幢一楼). The landlord of the Site is Yongkang Hanchuan Industry and Trade Co., Ltd. (永康市韩川工贸有限公司).

The Site occupies one building with a total construction area of 12,500 square meters. Detailed layout of the building is listed as below:

- One 4-storey production building:
 - The 1st floor is used as warehouse, the tube cutting, metal processing, water swelling and welding workshops;
 - The 2nd floor is used as warehouse, the polishing and washing workshops;
 - The 3rd floor is used as office, warehouse, the screen printing, heat transfer printing, laser marking, assembling, inspection and packing workshops; and
 - The 4th floor is used as the spray painting and powder coating workshops.

Adjacent facilities and properties of the Site are identified as follows:

- North: An unknown factory;
- South: Baili West Road (百里西路);
- East: Yongkang Hongda Kitchenware Factory (永康市鸿达厨具厂);
- West: One Gas Station (加油站).

The Site is located in an industrial area and surrounded by one road, one gas station and other factories. No environmental sensitive receptors such as school, residences, etc. are located within 100 meters of the Site.

Raw materials used mainly are stainless steel pipe and plastic powder. The main chemicals used at the Site are lubricant oil, hydraulic oil, cleanser, paint, thinner, printing ink, sodium hydroxide, polyaluminum chloride (PAC) and polyacrylamide (PAM).

The air emissions generated from the Site include:

- Volatile Organic Compounds (VOCs) from the spray painting and screen printing processes, the baking channel of the powder coating process is collected and discharged through one high exhaust stack after being treated by a set of wet scrubber, cotton filter, activated carbon absorber and catalytic combustion facility;
- VOCs from the heat transfer printing process is fugitively discharged;
- Dust from the polishing process is collected and discharged through four high exhaust stacks after being treated by four sets of wet scrubbers;
- Dust from the powder coating process is collected and discharged through one high exhaust stack after being treated by a powder recycling system;
- Smoke from the welding process is fugitively discharged; and
- Smoke from the laser marking process is collected and discharged without treatment.

Industrial wastewater generated from the spray painting, water swelling, washing and wet scrubbers is discharged into the public sewer system after being treated by the onsite wastewater treatment facility (WWTF). Domestic wastewater from washrooms is treated by onsite septic tanks firstly, and then

discharged into the public sewer system together with the treated industrial wastewater through the same discharge outlet.

Noise is generated from the tube cutting, metal processing, water swelling, welding, polishing, spray painting and powder coating processes at the Site.

GBS/EHS Management:

Mr. Wenqiang Yang (Vice General Manager of the Site) and Mr. Yahui Liu (Safety Officer) take charge of the general Environment, Health and Safety (EHS) affairs and they are holding safety certificates in safety management.

Employee Interview

Number of Selected Employees: There were total 55 employees working at the Site. During the audit, 15 employees (27.3%) were randomly selected for interview according to the roster and during the Site tour.

Age Groups/Gender: Of the 15 interviewed employees, 3 are 18-30 years old, 7 are 30-40 years old and 5 are 40-50 years old, including 9 males and 6 females.

Employment Period: Of the 15 interviewed employees, 1 has worked for less than 1 year, 10 have worked for 1-3 years and 4 have worked for more than 3 years.

Operational Activities: All the interviewed employees were from the tube cutting, metal processing, water swelling, washing, welding, polishing, spray painting, powder coating, screen printing, heat transfer printing, laser marking, assembling, inspection and packing workshops, which covered all processes and positions at the Site.

Finding Number: 2.38 and 4.2a

Best Practices:

None

Opening and Closing Meetings:

An opening meeting was conducted at 9:00 and attended by the Site representatives Mr. Wenqiang Yang (Vice General Manager) and Mr. Jian Zhang (Production Director) together with Nicky Zhou (ESTS Auditor). The auditor introduced the purpose, contents and procedure of the audit, NBCU Manufacturer Code of Conduct (COC), as well as the Factory Awareness Guide. The Site representative Mr. Wenqiang Yang signed the NBCU Manufacturer COC.

A closing meeting was conducted at 16:55 and attended by the Site representatives Mr. Wenqiang Yang (Vice General Manager) and Mr. Jian Zhang (Production Director) together with Nicky Zhou (ESTS Auditor). The auditor raised the issues identified and introduced the follow-up section. All findings were confirmed by the Site representatives. The Site representatives expressed that they were willing to follow the relevant requirements of NBCU and close the findings as soon as possible.

Results Summary

Section	Is there a finding?	If there is a finding, then list finding ID/Flag Type	Auditor Notes
Underage Labor	No	/	/
Forced Labor	No	/	/
Prison Labor	No	/	/
Working Hours	No	/	/
Wages & Compensation	Yes	4.2a- Yellow flag	/
Discrimination/Human Rights	No	/	/
Freedom of Association	No	/	/
Facilities/Building Conditions	No	/	/
Fire Prevention/Emergency Response	Yes	1.4- Yellow flag	/
Occupational Health & Safety (Include all permits)	Yes	1.3.1- Yellow flag 1.3.2- Yellow flag 1.3.3- Yellow flag 2.13- Red flag 2.22- Red flag 2.26- Red flag	/
Environmental Conditions (Include Waste, Air, Water)	Yes	1.2.1- Yellow flag 1.2.2- Yellow flag 2.11- Red flag 2.15- Red flag	/
Dormitories	N/A	/	/
Canteen & Cafeteria Services	N/A	/	/
Medical	Yes	2.38- Red flag	/
Security	No	/	/

1. Number of Fulltime Employees/Workers

Department	First Shift	Second Shift	Third Shift as applicable	Peak Season
Office and Administrative Staff/GBS/EHS	4	/	/	/
Tube Cutting	1	/	/	/
Metal Processing	13	/	/	/
Water Swelling	1	/	/	/
Washing	1	/	/	/
Welding	7	/	/	/
Polishing	10	/	/	/
Spray Painting	2	/	/	/
Powder Coating	2	/	/	/
Screen Printing/Heat Transfer Printing	2	/	/	/
Laser Marking	1	/	/	/
Assembling, Inspection and Packing	10	/	/	/
Warehouse/Distribution	1	/	/	/
Total Number of Employees/Workers	55	/	/	/

2. Production Process – include chemicals used in the production process

Production process	Check if applicable to Site	Chemicals used	Approximate volume of chemicals used/stored monthly as observed by Auditor
Machine Maintenance	Yes	Lubricant Oil	10 kg
	Yes	Hydraulic Oil	46 kg
Washing	Yes	Cleanser	50 kg
Spray Painting	Yes	Paint	500 kg
	Yes	Thinner	600 kg
Powder Coating	Yes	Plastic Powder	600 kg
Screen Printing	Yes	Printing Ink	1.5 kg
	Yes	Thinner	2 kg
Wastewater Treatment Facility (WWTF)	Yes	Sodium Hydroxide	5 kg
	Yes	Polyaluminum Chloride (PAC)	4 kg

	Yes	Polyacrylamide (PAM)	2 kg
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Findings to be Addressed:


NBCUniversal has implemented an audit performance scoring system for the purpose of granting extensions to the company's annual re-audit requirement. *This score is used to calculate re-audit timing only and is not approval for production to commence.*


○ **Audit Approval Extensions:**

- If the factory scores below 85% on an audit, a 12-month re-audit cycle will apply, without exception.
- If the factory scores 85% or better **and corrects and closes all audit findings**, the factory could qualify for an extension of the re-audit. The annual audit requirement may be extended to 18 or 24 months depending on the audit score.


○ **Production Authorization:**

- If this is the initial audit of the factory production cannot commence **until all red flagged findings are addressed** and official notification is received from the NBCUniversal business unit. Please note that production is not allowed until your factory has been approved and an NBCU approval letter is received.

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
2.11	Waste Water 废水	Red 红旗	<p>2.11 Industrial wastewater generated from the spray painting, water swelling, washing and wet scrubbers is discharged into the public sewer system after being treated by the onsite wastewater treatment facility (WWTF). Domestic wastewater from washrooms is treated by onsite septic tanks firstly, and then discharged into the public sewer system together with the treated industrial wastewater through the same discharge outlet. However, the Site did not conduct environmental monitoring for the discharged wastewater in the past 12 months, and the compliance status was unknown. In addition, the WWTF was not operating normally on the audit day and part industrial wastewater was leaking into storm drains.</p> <p>工厂喷漆、水胀、清洗和气体洗涤器产生的工业废水，经厂区污水处理设施处理后，排入市政污水管道。洗手间产生的生活污水经过厂区化粪池处理后与经过处理的生产废水通过同一个排放口排入市政污水管道。然而，工厂在过去 12 个月内未对排放的污水进</p>	<p>2.11 The Site should ensure the WWTF is operated normally and the industrial wastewater is not leaked into storm drains. In addition, the Site should contact a licensed monitoring institution to conduct environmental monitoring for the discharged wastewater periodically. If monitoring results exceed discharge limits, the Site should take corrective actions to meet the requirements. The discharged wastewater should meet the Class III Standard of Integrated Wastewater Discharge Standard (GB8978-1996).</p> <p>工厂应确保污水处理设施正常运行且工业废水不会泄漏进雨水管网。同时，工厂应联系有资质的检测单位对排放的污水定期进行环境检测。如果检测结果超过标准，工厂应按要求进行整改。</p> <p>污水排放应符合《污水综合排放标准》（GB8978-1996）三级标准。</p>	

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
			行环境检测，达标情况未知。同时，审核当天污水处理设施未正常运行，部分工业废水排入雨水管网。		
2.13	Chemical Storage 化学品存放	Red 红旗	<p>2.13 No secondary containment or safety label was available for thinner being used in the screen printing workshop at the Site.</p> <p>工厂丝印车间使用的稀释剂没有设置二次容器，也未张贴安全标签。</p>	<p>2.13 The Site should set up functional secondary containments for all chemicals used and stored at the Site and post proper safety labels for all chemical containers. Secondary containment for a single container should be capable of containing 110% of the volume contained in the primary container. For multiple containers, the secondary containment system should have sufficient capacity to contain 10% of the aggregated volumes of all containers or 150% of the volume of the largest container, whichever is greater. Chemical safety labels should include substance name, number, risk sign, warning word, risk overview, safety measures, fire extinguishing methods, manufacturer, address, telephone number, emergency consultation telephone number, prompt reference to safety technical specification and so on.</p> <p>工厂应为使用和存放的所有化学品设置有效的二次容器，并在所有化学品容器上张贴合适的安全标签。独立容器的二次容器的容积应大于基本容器容积的 110%。多个化学品容器设置于同一个二次容器时，该二次容器的容积应不小于所有容器容积总和的 10%或最大容器的容积的 150%，以两个计算结果中大的容积为准。化学品安全标签应包括物质名称、编号、危险性标志、警示词、危险性概述、安全措施、灭火方法、生产厂家、地址、电话、应急咨询电话、提示参阅安全技术说明书等内容。</p>	
2.15	Air Emissions	Red	2.15 Air emissions generated at the Site include:	2.15 The Site should contact a licensed	N/A

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
	废气	红旗	<p>1) Volatile Organic Compounds (VOCs) from the spray painting and screen printing processes, the baking channel of the powder coating process is collected and discharged through one high exhaust stack after being treated by a set of wet scrubber, cotton filter, activated carbon absorber and catalytic combustion facility;</p> <p>2) VOCs from the heat transfer printing process is fugitively discharged;</p> <p>3) Dust from the polishing process is collected and discharged through four high exhaust stacks after being treated by four sets of wet scrubbers;</p> <p>4) Dust from the powder coating process is collected and discharged through one high exhaust stack after being treated by a powder recycling system;</p> <p>5) Smoke from the welding process is fugitively discharged; and</p> <p>6) Smoke from the laser marking process is collected and discharged without treatment.</p> <p>The Site did not conduct environmental monitoring for all above air emissions and the compliance status was unknown.</p> <p>工厂的废气污染物包括:</p> <p>1) 喷漆和丝印工序以及喷塑工序烘道产生的有机废气, 收集后并经 1 套气体洗涤器、过滤棉、活性炭吸附和催化燃烧设备处理后通过 1 个排气筒高空排放;</p> <p>2) 热转印工序产生的有机废气, 无组织排放;</p> <p>3) 抛光工序产生的粉尘, 经收集并经 4 套气体洗涤器处理后通过 4 个排气筒高空排放;</p> <p>4) 喷塑工序产生的粉尘, 经收集并经 1 套塑粉回收系统处理后通过 1 个排气筒高空排放;</p> <p>5) 焊接工序产生的烟尘, 无组织排放;</p> <p>6) 激光打标工序产生的烟尘, 收集后未经处理排放。</p> <p>工厂尚未对以上的废气进行环境检测, 达标情况未知。</p>	<p>monitoring institution to conduct environmental monitoring for all air emissions annually. If monitoring results exceed discharge limits, the Site should take corrective actions to meet the requirements. The discharged VOCs and dust should meet Emission Standard of Air Pollutants for Industrial Surface Coating (DB33/2146-2018);</p> <p>The discharged smoke should meet Standard in Stable 2 of Integrated Emission Standard of Air Pollutants (GB16297-1996).</p> <p>工厂应联系有资质的检测单位每年对所有废气进行环境检测。如果检测结果超过标准, 工厂应按要求进行整改。</p> <p>有机废气和粉尘排放应满足《工业涂装工序大气污染物排放标准》(DB33/2146-2018); 烟尘排放应满足《大气污染物综合排放标准》(GB16297-1996) 表 2 标准。</p>	

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
2.22	PPE 个人防护用品	Red 红旗	<p>2.22 The potential occupational health hazards identified mainly are VOCs from the spray painting, screen printing and heat transfer printing processes, dust from the polishing and powder coating processes, noise from the tube cutting, metal processing, water swelling, welding, polishing, spray painting and powder coating processes, smoke from the argon arc welding process, smoke and laser radiation from the laser welding and laser marking processes. The Site provided earplugs, dustproof masks and activated carbon masks to all relevant production workers exposed to noise, dust and VOCs respectively, and provided Personal Protective Equipment (PPE) usage training to them. In addition, the Site posted PPE requiring signs (earplugs, dustproof masks and anti-poison masks) and occupational health hazard warning signs of noise, dust, laser radiation and VOCs in the relevant workshops. However, 2 screen printing and heat transfer printing workers and 2 welding workers were not wearing the provided activated carbon masks and earplug respectively.</p> <p>工厂潜在的职业病危害因素包括喷漆、丝印和热转印工序产生的挥发性有机物，抛光和喷塑工序产生的粉尘，切管、金属加工、水胀、焊接、抛光、喷漆和喷塑工序产生的噪声，焊接（氩弧焊）工序产生的烟尘，以及焊接（激光焊接）和激光打标工序产生的烟尘和激光辐射。工厂分别提供了耳塞，防尘口罩和活性炭口罩给接触噪声、粉尘和挥发性有机物的相关工人，并给工人提供了关于使用个人防护用品的培训。同时，工厂在相关车间张贴了相应的佩戴个人防护用品标识（耳塞、防尘口罩和防毒口罩）及噪声、粉尘、激光辐射和挥发性有机物的职业病危害警示标识。然而，工厂 2 名丝印和热转移工人和 2 名焊接工人分别未佩戴工厂提供的活性炭口罩和耳塞。</p>	<p>2.22 The Site should provide refresher training to workers on PPE usage and enhance the daily management to ensure PPEs are properly used by those workers exposed to occupational health hazards.</p> <p>工厂应重新给工人提供正确使用劳保用品的培训，并加强日常监管以保证接触职业病危害因素的工人正确地使用个人防护用品。</p>	

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
2.26	Industrial Hygiene 工业卫生	Red 红旗	<p>2.26 The potential occupational health hazards of VOCs is identified from the spray painting, screen printing and heat transfer printing processes, dust is identified from the polishing and powder coating processes, smoke is identified from the argon arc welding process, smoke and laser radiation is identified from the laser welding and laser marking processes. The Site conducted the industrial hygiene (IH) monitoring for VOCs in the spray painting, screen printing and heat transfer printing workshops, dust in the polishing and powder coating workshops, smoke in the argon arc welding workshop, smoke and laser radiation in the laser welding workshop in May 2023, and the monitoring result met the standards. However, the Site did not conduct the IH monitoring for smoke and laser radiation in the laser marking workshop.</p> <p>工厂潜在的职业病危害因素包括喷漆、丝印和热转印工序产生的挥发性有机物，抛光和喷塑工序产生的粉尘，焊接（氩弧焊）工序产生的烟尘，以及焊接（激光焊接）和激光打标工序产生的烟尘和激光辐射。工厂于 2023 年 5 月对喷漆、丝印和热转印车间的挥发性有机物，抛光和喷塑车间的粉尘，氩弧焊车间的烟尘，以及激光焊接车间的烟尘和激光辐射进行了工业卫生检测，检测结果符合要求。然而，工厂未对激光打标车间的烟尘和激光辐射进行工业卫生检测。</p>	<p>2.26 The Site should contact a licensed monitoring institution to conduct the IH monitoring for smoke and laser radiation in the laser marking workshop annually. If monitoring results exceed standard limits, the Site should take corrective actions to control the occupational hazards.</p> <p>工厂应联系有资质的检测单位对激光打标车间的烟尘和激光辐射每年进行工业卫生检测。如果检测结果超过标准，工厂应采取措施控制职业病危害因素。</p>	N/A
2.38	Medical 医疗	Red 红旗	<p>2.38 The potential occupational health hazards identified mainly are VOCs from the spray painting, screen printing and heat transfer printing processes, dust from the polishing and powder coating processes, noise from the tube cutting, metal processing, water swelling, welding, polishing, spray painting and powder coating processes, smoke from the argon arc welding process, smoke and laser radiation from the laser welding and laser marking</p>	<p>2.38 The Site should establish occupational health surveillance mechanism, and provide pre-job, on-the-job and post-job occupational health check-ups to all the workers exposed to occupational health hazards.</p> <p>工厂应建立职业健康监护机制，并为暴露在职业病危害岗位的所有工人提供相应的岗前、在岗和离岗职业健康检查。</p>	N/A

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
			<p>processes. As per onsite observation and management interview, there were 2 spray painting workers, 2 powder coating workers, 2 screen printing/heat transfer printing workers, 1 tube cutting worker, 13 metal processing workers, 1 water swelling worker, 3 argon arc welding workers, 4 laser welding workers, 10 polishing workers and 1 laser marking worker. There were 9 newly recruited and 3 resigned workers at the above posts in the past 12 months. However, the Site did not establish occupational health surveillance mechanism, and only provided pre-job occupational health check-ups to 3 workers and provided on-the-job occupational health check-ups to 27 workers (including 2 spray painting workers, 2 powder coating workers, 13 metal processing workers, 3 argon arc welding workers, 3 laser welding workers and 4 polishing workers). The Site did not provide pre-job, on-the-job and post-job occupational health check-ups to the rest workers mentioned above.</p> <p>工厂潜在的职业病危害因素包括喷漆、丝印和热转印工序产生的挥发性有机物，抛光和喷塑工序产生的粉尘，切管、金属加工、水胀、焊接、抛光、喷漆和喷塑工序产生的噪声，焊接（氩弧焊）工序产生的烟尘，以及焊接（激光焊接）和激光打标工序产生的烟尘和激光辐射。现场观察及管理层确认，发现工厂有 2 名喷漆工人、2 名喷塑工人、2 名丝印和热转印工人、1 名切管工人、13 名金属加工工人、1 名水胀工人、3 名氩弧焊工人、4 名激光焊接工人、10 名抛光工人和 1 名激光打标工人。过去 12 个月内，以上岗位有 9 名工人入职及 3 名工人离职。然而，工厂未建立职业健康监护机制，在最近 12 个月内仅提供了岗前职业健康检查给 3 名工人，提供了在岗职业健康检查给 27 名工人（包括 2 名喷漆工人、2 名喷塑工人、13 名金属加</p>		

No. 编号	Finding Category 问题点类别	Flag Type 红旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
			工工人、3 名氩弧焊工人、3 名激光焊接工人和 4 名抛光工人）。工厂未给以上岗位剩余的工人提供岗前、在岗和离岗职业健康检查。		

No. 编号	Finding Category 问题点类别	Flag Type 黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
1.2.1	Environmental Permits 环境许可文件	Yellow 黄旗	1.2.1 The Site compiled Environmental Impact Assessment (EIA) Registration Form for the existing project in May 2023. However, the Site did not obtain the corresponding EIA Approval for the project yet. 工厂于 2023 年 5 月对现有项目编制了环境影响登记表, 但尚未获得环评批复。	1.2.1 The Site should obtain the EIA Approval from the local Ecology Environment Bureau (EEB) for the construction project. 工厂应取得当地生态环境局对建设项目的批复。	N/A
1.2.2	Environmental Permits 环境许可文件	Yellow 黄旗	1.2.2 The Site did not conduct Environmental Protection Check and Acceptance (EPCA). 工厂没有进行建设项目环保竣工验收。	1.2.2 The Site should conduct EPCA and register the information at the website (http://114.251.10.205/). 工厂应进行建设项目环保竣工验收并在网站上进行备案登记。备案登记的网址为： http://114.251.10.205/ 。	N/A
1.3.1	Health & Safety Permits 健康安全许可文件	Yellow 黄旗	1.3.1 The Site did not conduct Occupational Health Protection Check and Acceptance (HPCA). 工厂没有进行职业病防护设施竣工验收。	1.3.1 The Site should conduct HPCA and publicize the result. 工厂应进行职业病防护设施竣工验收并公示结果。	N/A
1.3.2	Health & Safety Permits 健康安全许可文件	Yellow 黄旗	1.3.2 The potential occupational health hazards identified mainly include VOCs from the spray painting, screen printing and heat transfer printing processes, dust from the polishing and powder coating processes, noise from the tube cutting, metal processing, water swelling, welding, polishing, spray painting and powder coating processes, smoke from the argon arc welding process, smoke and laser radiation from the laser welding and laser marking processes. However, no Occupational Health Hazard Registration (OHR) form or return receipt were	1.3.2 The Site should contact the local Health Bureau, register the occupational health hazards according to their instruction, and obtain the return receipt. 工厂应联系当地卫生局, 根据其指示对所有职业病危害因素进行申报登记, 并取得回执。	N/A

No. 编号	Finding Category 问题点类别	Flag Type 黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
			provided for review. 工厂潜在的职业病危害因素包括喷漆、丝印和热转印工序产生的挥发性有机物，抛光和喷塑工序产生的粉尘，切管、金属加工、水胀、焊接、抛光、喷漆和喷塑工序产生的噪声，焊接（氩弧焊）工序产生的烟尘，以及焊接（激光焊接）和激光打标工序产生的烟尘和激光辐射。但工厂未提供职业病危害因素申报表和回执以供审阅。		
1.3.3	Health & Safety Permits 健康安全许可 文件	Yellow 黄旗	1.3.3 The address on the business license was not updated. The actual address of the Site is Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China, while the address on the business license is only registered as 1st Floor, Building 2, No.8, Baili West Road, Dongcheng Street, Yongkang City, Jinhua City, Zhejiang Province, China. The whole Building 2 (from the 1 st floor to the 4 th floor) is actually occupied by the Site. 工厂营业执照地址信息未更新。工厂的实际地址为：中国浙江省金华市永康市东城街道百里西路 8 号第 2 幢，但营业执照上的地址仅注册为：中国浙江省金华市永康市东城街道百里西路 8 号第 2 幢一楼。工厂实际使用了整个 2 幢的 1 至 4 楼。	1.3.3 The Site should update the address on the business license with the local Market Supervision and Administration Department. 工厂应到当地市场监督管理部门更新营业执照地址。	N/A
1.4	Fire Protection Permits 消防许可文件	Yellow 黄旗	1.4 The Site rented one 4-storey production building since September 2022. However, the Site could not provide the Fire Protection Check and Acceptance (FPCA) for this building. 工厂自 2022 年 9 月开始租用 1 栋 4 层的生产楼。然而，工厂不能提供该建筑的消防验收文件。	1.4 The Site should apply the FPCA for the afore-mentioned building occupied by the Site to the Housing Bureau, and obtain the corresponding registration records. 工厂应为所使用的建筑进行消防验收，并向住建局申请取得相应的备案凭证。	N/A
4.2a	Wages 工资	Yellow 黄旗	4.2a The Site did not provide 5 types of social insurance for all production workers required by law. There were 51 production workers at the Site, and 3 of them had reached retired age. Based on the social insurance records of April 2023, only 9 out of 48	4.2a The Site should provide all the 5 types of social insurance including retirement insurance, maternity insurance, unemployment insurance, medical insurance and work-related injury insurance to all	N/A

No. 编号	Finding Category 问题点类别	Flag Type 黄旗	Audit Findings 问题点	Recommendations 整改建议	Photos 照片
			<p>eligible production workers participated in retirement, medical, unemployment, maternity and work-related injury insurances. Based on management and worker interviews, the Site did not purchase social insurance for the remaining production workers to save cost, and some production workers from other provinces were reluctant to buy social insurance as they did not want to afford the personal part of social insurance.</p> <p>工厂没有按照法规要求给所有生产工人提供 5 种社保。工厂共有 51 名生产工人，其中 3 名已达到退休年龄。根据 2023 年 4 月的社保记录，工厂仅为 48 名符合参保条件的生产工人中的 9 名购买了养老、医疗、失业、生育和工伤保险。根据管理层及工人访谈了解，工厂为了节省成本没有主动给其余的生产工人购买社保，同时，部分生产工人来自于外省，他们不想承担社保个人部分的费用而不愿意购买社保。</p>	<p>eligible production workers.</p> <p>工厂应给所有符合参保条件的生产工人提供所有 5 种社保，包含养老保险、生育保险、失业保险、医疗保险和工伤保险。</p>	

Notes (备注)

- Black Flag** - if there is a finding of possible child or prison labor, factory will be disqualified for use if confirmed.
黑旗 – 如果工厂有疑似童工或者狱工的问题点，确认后，工厂将被取消使用资格。
- Red Flag** - all red flagged findings must be closed or downgraded within 90 days of the audit. (If you are unable to meet the closure timeline please contact Nicky Zhou / ESTS <Nicky.Zhou@estsglobal.com> and Itai Katsufumi- 板井克文 / NBCUniversal <Katsufumi_Itai@usjc.co.jp>)
红旗 – 所有的红旗问题点都必须在审核后的 90 天内关闭或者降级。（如果在规定的时间节点内无法完成整改，请联系 Nicky Zhou / ESTS <Nicky.Zhou@estsglobal.com> 或 Itai Katsufumi-板井克文 / NBCUniversal <Katsufumi_Itai@usjc.co.jp>）
- Yellow Flag** - all yellow flagged findings must be closed before scheduled re-audit.
黄旗 – 所有的黄旗问题点都必须在预定的复审时间之前关闭。

Photo Summary:

	
Entrance View from the Street of the Factory	Photo of Factory Sign
	
Exterior Photos (wide angle)	North of the Site
	
South of the Site	East of the Site



West of the Site



Tube Cutting Area



Metal Processing Area-1



Metal Processing Area-2



Water Swelling Area



Washing Area



Welding Area



Polishing Area



Powder Coating Area



Spray Painting Area



Screen Printing and Heat Transfer Printing Area



Laser Marking Area



Assembling, Inspection and Packing Area



Raw Material Storage Area



Finished Goods Warehouse



Chemical Warehouse



Hazardous Waste Warehouse



Collection Facility for Volatile Organic Compounds (VOCs) from the Spray Painting Process



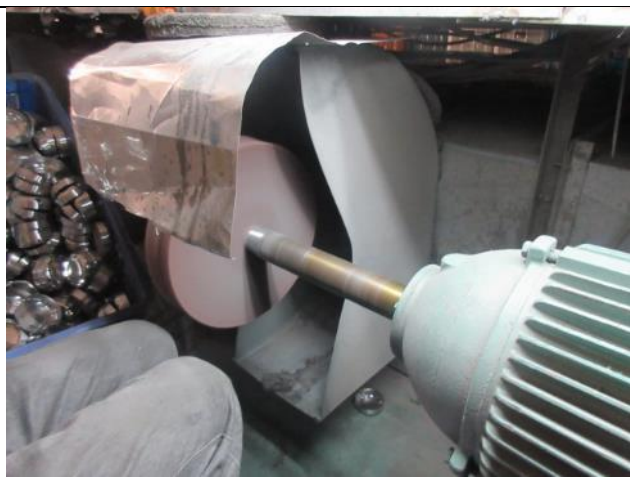
Collection Facility for VOCs from the Baking Channel of the Powder Coating Process



Collection Facility for VOCs from the Screen Printing Process



Wet Scrubber, Cotton Filter, Activated Carbon Absorber, Catalytic Combustion Facility and Discharge Outlet for VOCs from the Spray Painting and Screen Printing Processes, the Baking Channel of Powder Coating Process



Collection Facility for Dust from the Polishing Process



Wet Scrubbers for Dust from the Polishing Process



Discharge Outlets for Dust from the Polishing Process



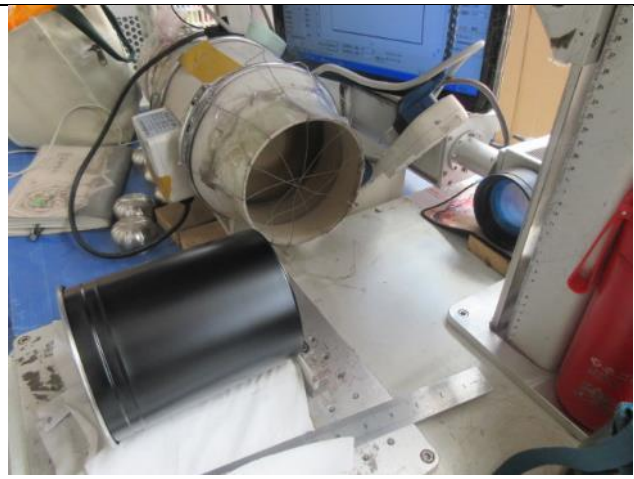
Collection Facility for Dust from the Powder Coating Process



Powder Recycling System for Dust from the Powder Coating Process



Discharge Outlet for Dust from the Powder Coating Process




Collection Facility for Smoke from the Laser Marking Process



Discharge Outlet for Smoke from the Laser Marking Process



Industrial Wastewater Treatment Facility

	Nil
Wastewater Discharge Outlet	Nil