

Monitored Party Dongguan Wanjia Paper Products Co., Ltd.	amfori ID 156-059390-000	Address Room 103, No.4 Humen Xinlian Road, Humen Town, Dongguan City, Guangdong Province, China, Dongguan, Guangdong Sheng, China
Monitoring Activity amfori Social Audit - Manufacturing	Monitoring Type Full Monitoring	Monitoring Partner Bureau Veritas Hong Kong Limited
Monitoring Start Date 19/12/2024	Closing Meeting Finished Date 19/12/2024	Submission Date 25/12/2024
Expiration Date 25/12/2025	Announcement Type Semi Announced	
Site Dongguan Wanjia Paper Products Co., Ltd.	Site amfori ID 156-059390-001	

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OVERALL RATING



SECTION RATING

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

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

GENERAL DESCRIPTION

Name of lead auditor: Inphy Wang; APSCA membership number: CSCA 21701775

Name of team auditor (if applicable): Nil; APSCA membership number: NA

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

Monitoring partner name: Bureau Veritas Consumer Products Service; APSCA Number: 11600002

Audit schedule details: The audit was planned for 1 auditor x 1 day.

Announcement Type: Semi-Announced Full audit

Monitoring date: December 19, 2024

Business partner information: Dongguan Wanjia Paper Products Co., Ltd. (东莞市万嘉纸制品有限公司, 91441900MA5678LG60) was established on April 6, 2021. And the address was Room 103, No.4 Humen Xinlian Road, Humen Town, Dongguan City, Guangdong Province, China. (广东省东莞市虎门镇虎门新联路4号103房). The factory specialized in manufacturing of paper product. And the main production processes included cutting and packing. Based on management interview, audited factory mainly engaged in trade and most processes which including printing, die-cutting, gluing, handwork and assembly were subcontracted to other factory. Based on onsite observation, there was one cutting machine and two packing workers worked during the audit date. The peak season was not obvious.

Audited location information: The floors used by auditee listed below. No dormitory, canteen and transportation were provided to workers.

One 1-storey production building:

1F: office, warehouse, cutting and packing

The building was rented.

Operating shifts and hours: There was 1 working shift for production department & office employees and working hours were from 8:00 to 17:30 with a rest from 12:00 to 13:30.

Working days from Monday to Friday and rest on Sunday. The maximum monthly overtime was 82 hours while maximum daily overtime was 2 hours. The maximum weekly working hours were 58 hours. The longest consecutive working days were 6 days.

Time recording system: The factory adopted electronic attendance system to record employees' working hours.

Salary payment details: Employees' wages were paid before the 15th of the following month by bank transfer with wage stubs issued. Per payroll review and interviews with management and employees, all employees were paid by hourly rate.

Worker number information:

- Total of 35 employees with 30 non-production staffs and 5 production workers
- Total 5 production workers with 5 males and 0 female
- Total 19 domestic migrant employee with 13 males and 6 females, no any foreign migrant, young, women pregnant, seasonal, temporary, disabled, home-based workers
- No any other special group workers (interns, apprentices, contractor workers etc.)

Good practices:

The auditee provided 15-minute break every 2 hours for workers.

Worker organization details: There was worker representative selected in 2024.

Circumstances: There was no special circumstance during the audit.

Summary of findings: Non-compliances were found in PA1, PA2, PA5, PA6, PA7 and PA13. Detailed findings refer to the report.

Living wage calculation: Living Wage please refer to BNW in attachment. BV had used the methodology which was similar with Anker Benchmark methodology to estimate the living wage by estimating the cost of a basic but decent life style for a worker and his/her family. This involved adding up the cost of three expenditure groups: food (for a low-cost nutritious diet), housing (for basic healthy housing), and other essential expenses for a family, and then adding a small margin for sustainability and emergencies. The reason BV did not use Anker benchmark is no data in GLWC for the area where the factory was located. The data source: onsite audit information collection (BV BNW). Minimum Content MEMO (MEMO (AC's 2018/06 1) There was a personal data protection law/requirement in China. Therefore, all attachments were involved in employees' personal data would be hidden during this audit.

Remark:

1. There are no contractor/agencies/government waivers/collective bargaining used or available by the auditee, which makes the contractor license/agency labour contract/government waivers/collective bargaining agreements not applicable.
2. Based on Guangdong Province Environment Impact Assessment Exemption List review, the audited factory did not need the environment impact assessment. So no relevant environment document to upload. In accordance with the Article

5 of Classified Administration Catalogue of Environmental Impact Assessments for Construction Projects (2021 Revision), construction projects not specified in this catalogue shall not be included in the environmental impact assessment management of construction projects.

SITE DETAILS

Site
Dongguan Wanjia Paper Products Co., Ltd.

Site amfori ID
156-059390-001

GICS Classification

Sector Materials	Industry Group Materials	Industry Paper & Forest Products
Sub Industry Paper Products		

amfori Process Classifications

N.A.

GS1 Classifications

N.A.

NACE Classification

N.A.

Water Stress Situation

N.A.

METRICS

Key Metrics

Total workforce	35	Workers
Legal minimum wage in local currency	1,900	Monthly
Lowest wage paid for regular work at the site	1,900	Monthly
Calculated living wage in local currency	2,398.23	Monthly
Total sample	5	Workers

Other Metrics

Male workers	21	Workers
Female workers	14	Workers
Non-binary workers	0	Workers
Permanent workers - Male	21	Workers
Permanent workers - Female	14	Workers
Permanent workers - Non-binary	0	Workers
Temporary workers - Male	0	Workers
Temporary workers - Female	0	Workers
Temporary workers - Non-binary	0	Workers
Seasonal workers - Male	0	Workers
Seasonal workers - Female	0	Workers
Seasonal workers - Non-binary	0	Workers
Management - Male	16	Workers
Management - Female	14	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	13	Workers
Domestic migrant workers - Female	6	Workers
Domestic migrant workers - Non-binary	0	Workers
Foreign migrant workers - Male	0	Workers

Foreign migrant workers - Female	0	Workers
Foreign migrant workers - Non-binary	0	Workers
Workers hired directly - Male	21	Workers
Workers hired directly - Female	14	Workers
Workers hired directly - Non-binary	0	Workers
Workers hired indirectly - Male	0	Workers
Workers hired indirectly - Female	0	Workers
Workers hired indirectly - Non-binary	0	Workers
Unionised workers - Male	0	Workers
Unionised workers - Female	0	Workers
Unionised workers - Non-binary	0	Workers
Workers under CBA - Male	0	Workers
Workers under CBA - Female	0	Workers
Workers under CBA - Non-binary	0	Workers
Pregnant workers	0	Workers
Workers on parental leave - Male	0	Workers
Workers on parental leave - Female	0	Workers
Workers on parental leave - Non-binary	0	Workers
Sample - Male	5	Workers
Sample - Female	0	Workers
Sample - Non-binary	0	Workers

FINDINGS



PA1: Social Management System

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory had set up management system to compliance with the BSCI Code of Conduct. However, some policies were improperly implemented and the factory did not monitor the management system accurately. This question was rated as partially compliance because there were only some gaps between the factory in some performance areas and the requirement of amfori BSCI. Please refer to BSCI PA1.1</p>	<p>基于文件查阅，管理层访谈，员工代表访谈和员工访谈，审核发现工厂已经建立了社会责任管理体系以符合BSCI行为准则，但部分制度没有执行到位，并且对其社会责任体系执行情况监管不到位。因为工厂仅仅只是在某些执行领域和Amfori BSCI的要求之间存在某些差距，所以这个问题点判为部分符合。请参看BSCI PA1.1</p>

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

ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory had established overtime management policy. This question was rated as partially compliance because the factory did not conduct production capacity evaluation, so that employees' overtime hours exceeded legal limit. Please refer to BSCI PA 1.4</p>	<p>基于文件查阅，管理层访谈，员工代表访谈和员工访谈，审核发现工厂虽然有建立加班管理程序，因为工厂没有进行产能评估，以至于员工加班超出法律规定。因此这个问题点判定为部分符合。请参看BSCI PA1.4</p>



PA 2: Workers Involvement and Protection

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

Question: 2.2 Is there satisfactory evidence that the auditee defines long-term goals for protecting workers in line with the aspirations of the amfori BSCI Code of Conduct?

ENGLISH	LOCAL LANGUAGE
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Finding	
Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory provided the commitment that they would implement the social responsibility according to the local law and BSCI Code of Conduct and the factory had a long-term goals. This question was rated as partially compliance because the factory did not follow the trail of the long-term goals. Please refer to BSCI PA2.2	基于文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂有承诺根据BSCI的行为准则执行社会责任且有建立长期目标。因为工厂没有对长期目标进行追踪，所以这个问题点判定为部分符合。 请参看BSCI PA2.2

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory established internal operational level grievance mechanism. This question was rated as partially compliance because the factory did not establish an effective operational level grievance mechanism for stakeholder (e.g. subcontractor, suppliers). Please refer to BSCI PA 2.5	基于文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂建立了内部申诉机制。因为工厂没有建立有效的针对利益相关方（如：外包商、供应商等）建议和申诉机制，所以这个问题点判定为部分符合。 请参看BSCI PA2.5

PA 5: Fair Remuneration

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

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

ENGLISH	LOCAL LANGUAGE
Finding	
Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory did not collect the information and calculate the basic needs wages to identify possible gaps existing between the actual remuneration and the basic needs wages. Therefore, this question was rates as non-compliance. Please refer to BSCI PA 5.4	基于文件查阅，管理层访谈，员工代表访谈和员工访谈，审核发现工厂没有进行基本需求工资信息收集和计算以识别其实际支付的工资和基本需求工资之间的差距，因此这个问题点判定为不符合。 请参看 BSCI PA 5.4

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

ENGLISH

LOCAL LANGUAGE

Finding

Based on document review, management interview, worker representatives' interview and employees' private interview, it was noted that 11 out of 35 (31%) employees were provided with accident, unemployment, maternity, pension and medical insurance in November 2024. The factory did not provide any other commercial accident insurance for employees. This question was rated as non-compliance because less than 80% employees were provided with social insurance. Please refer to Article 73 of the Labor Law of the People's Republic of China.

基于文件查阅，管理层访谈，员工代表访谈和员工访谈，审核发现工厂在2024年11月为11/35（31%）名员工提供工伤，失业，生育，养老和医疗保险。工厂没有为员工提供其它商业保险。因为少于80%的员工提供了社保，所有这个问题点判定为不符合。请参看《中华人民共和国劳动法》第73条。

PA 6: Decent Working Hours

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

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

ENGLISH

LOCAL LANGUAGE

Finding

Based on document review, management interview, worker representatives' interview and employees' private interview, 10 out of 15 sample population employees worked in excess of the statutory overtime hour limits. Therefore, this question was rates as non-compliance, because employees' monthly overtime hours exceeded 36 hours. A review of 15 sample population employees' time records (5 samples selected from November 2024 as current paid month, 5 samples selected from August 2024, 5 samples selected from February 2024) yielded the following:

- 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 80-82 hours) in November 2024, which was not in compliance with the legal requirement;
- 5 out of 5 sample population employees worked in excess of 36 overtime hours per month (i.e. 76 hours) in August 2024, which was not in compliance with the legal requirement;

Please refer to Article 41 of the Labor Law of the

基于文件查阅，管理层访谈，员工代表访谈和员工访谈，审核员发现员工加班时间超出了法定标准。审核员从工厂提供的工时记录中抽取15个样本(从最近支付月份2024年11月抽取5个，从2024年8月抽取5个,从2024年2月抽取5个)，发现共有10个样本加班时间超出了法定标准。因为员工的月加班超过36小时，所以这个问题点判定为不符合。具体为：

- 5/5名员工在2024年11月的加班时间为80-82小时，超过每月加班时间不能超过36小时的法律规定；
- 5/5名员工在2024年8月的加班时间为76小时，超过每月加班时间不能超过36小时的法律规定；

请参看《中华人民共和国劳动法》第41条

Finding

PRC.

PA 7: Occupational Health and Safety

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

Question: 7.2 Is there satisfactory evidence that the auditee seeks to improve workers' protection in case of accident, including through compulsory insurance schemes?

ENGLISH

LOCAL LANGUAGE

Finding

Based on site observation, document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory had provided accident insurance for 11 out of 35 (31%) employees in November 2024. And the factory did not provide any other commercial accident insurance for employees. This question was rated as partially compliance because accident insurance did not cover all employees.

Please refer to Article 73 of the Labor Law of the People's Republic of China.

基于文件查阅、管理层访谈、员工代表访谈和员工访谈，工厂在2024年11月为11/35（31%）名员工提供工伤保险。工厂没有为员工提供其它商业保险。因为工伤保险没有覆盖所有员工，所以这个问题点判定为部分符合。
请参看《中华人民共和国劳动法》第73条。

Question: 7.8 Is there satisfactory evidence that the auditee has developed and implemented accident and emergency procedures?

ENGLISH

LOCAL LANGUAGE

Finding

Based on site observation, document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory had established emergency procedures. This question was partially compliance because the procedures established by the factory were not visually displayed in workshops.
Please refer to BSCI PA 7.8

基于现场观察、文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂有制定了事故应急处理程序。因为工厂建立的事故应急处理程序没有在车间进行明显的展示，所以这个问题点判定为部分符合。
请参看BSCI PA 7.8

Question: 7.11 Is there satisfactory evidence that the auditee confirms that the equipment and buildings used for production are stable and safe?

ENGLISH

LOCAL LANGUAGE

Finding	
<p>Based on site observation, document review, management interview, worker representatives' interview and employees' private interview, it was noted that the production building occupied by the factory were in good condition. This question was rated as non-compliance because it was noted that the factory did not provide fire acceptance check for one 1-storey production building, the construction area of these buildings were about 1139 square meters.</p> <p>Please refer to Article 14 of Interim Provisions on Management of Fire Prevention Design Examination and Acceptance Check of Construction Project.</p>	<p>基于现场观察、文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂的生产楼处于良好状态中。因为工厂未能向审核员提供1栋1层生产楼的消防验收报告，总建筑面积约1139平方米。所以这个问题点判定为不符合。</p> <p>请参看《建设工程消防设计审查验收管理暂行规定》第14条。</p>

Question: 7.25 Is there satisfactory evidence the auditee verifies that temperature, humidity, space, sanitation, illumination are adequate for the health and safety of workers?	
ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on site observation, document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory had not yet assessed the temperature and humidity in the workshop in such a way that was adequate for workers' specific activities. So this question was rated as non-compliance.</p> <p>Please refer to BSCI PA 7.25</p>	<p>基于现场观察、文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂没有评估员工工作场所的温湿度等是否合适。所以这个问题点判定为不符合。</p> <p>请参看BSCI PA7.25</p>

PA 13: Ethical Business Behaviour

Site: Dongguan Wanjia Paper Products Co., Ltd. | Site amfori ID: 156-059390-001

Question: 13.1 Is there satisfactory evidence that the auditee actively opposes any act of corruption, extortion or embezzlement, or any form of bribery in its activities as a business enterprise?	
ENGLISH	LOCAL LANGUAGE
Finding	
<p>Based on site observation, document review, management interview, worker representatives' interview and employees' private interview, it was noted that the factory conducted risk assessment on corruption. This question was rated as partially compliance because the prevention measures of all</p>	<p>基于现场观察、文件查阅、管理层访谈、员工代表访谈和员工访谈，审核发现工厂做了廉政风险评估。因为所有风险的预防措施都是相同的，如设置监督电话和设置联席会议等，所以这个问题点判定为部分符合。</p> <p>请参看BSCI PA 13.1</p>

Finding

risks were the same, such as setting supervisory phone and conduct joint meeting, etc.
Please refer to BSCI PA 13.1.