

Monitored Party <b>Shantou Mingtu Hardware Co., Ltd.</b>	amfori ID <b>156-044759-000</b>	Address <b>108, the first floor of the plant on the south side of Dongshenfeng Road, Xinmei Road, Xianshi Village, Xinan Town, Chenghai District, 515832 Shantou, Guangdong Sheng, China</b>
Monitoring Activity <b>amfori Social Audit - Manufacturing</b>	Monitoring Type <b>Full Monitoring</b>	Monitoring Partner <b>TUV Rheinland</b>
Monitoring Start Date <b>23/05/2025</b>	Closing Meeting Finished Date <b>23/05/2025</b>	Submission Date <b>30/05/2025</b>
Expiration Date <b>30/05/2026</b>	Announcement Type <b>Semi Announced</b>	
Site <b>Shantou Mingtu Hardware Co., Ltd.</b>	Site amfori ID <b>156-044759-001</b>	

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## OVERALL RATING



## SECTION RATING

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

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

## GENERAL DESCRIPTION

Lead auditor: Alina Zhu; APSCA membership number: CSCA 21701851

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

Announcement Type: Semi-Announced

Monitoring partner name: TUV Rheinland

Business partner information: The factory was founded on 26 April 2016 and located at 108, the first floor of the plant on the south side of Dongshenfeng Road, Xinmei Road, Xianshi Village, Xinan Town, Chenghai District, Shantou City, Guangdong Province, China (中国广东省汕头市澄海区溪南镇仙市村新美路东神凤路南侧厂房第一层108). The product manufactured by the auditee was Screwdriver, the main processes were assembly and packing. There was no production process subcontracted to other facilities. There was no apparent peak or low season in the facility in the past one year.

Audited location information: As per onsite observation, management and workers interview, within the boundary. The facility only rented one flat production building as production, warehouse and office. There was no dormitory or canteen provided to the employees. The total building areas used by the auditee were 1050 square meters. There was no other facility in the compound. No transportation was provided to employees. No security guard was used by the auditee.

Operating shifts and hours: Attendances records from 1 May 2024 to 23 May 2025 were reviewed, and 6 samples were elected randomly from the workers. Per the workers and the management, no off-clock work was reported. One shift was arranged. The normal working time was 8:00-11:30, 13:30-18:00, OT from 19:00-20:00/21:00. The maximum daily overtime was 2 hours, the maximum weekly overtime was 14 hours, and the maximum monthly overtime was 64 hours. Workers were guaranteed with 1 day off after 6 consecutive working days.

Time recording system: Fingerprinting attendance machine was used to register the attendance of workers.

Salary payment details: The payroll records for all the employees from May 2024 to April 2025 were available for review. The factory paid workers RMB10.63 per hour (RMB1850 a month), which met the legal requirements (RMB10.63 per hour) since 1 March 2025. The factory paid workers RMB9.89 per hour (RMB1720 a month), which met the legal requirements (RMB9.89 per hour) before 1 March 2025. The wages were paid by hourly rate and the pay slips were provided to the employees. There was no unreasonable deductions in the wages. The factory paid the wages to employees on or before 15th of the following month by cash. The factory had paid 150% and 200% of normal rate wage for overtime work on weekdays and rest days respectively.

Worker number information: There were total 23 employees (included 18 production worker and 5 non-production workers, 18 production worker(included 11 males and 7 females), 1 domestic migrant worker (included 1 male and 0 female), no foreign migrant, young worker, pregnant worker, seasonal worker, temporary worker, disabled worker, home-based worker and no interns, apprentices, contractor workers) in the factory.

Good practices: Nil

Worker organization details: No trade union was established, 2 worker representatives were elected on 8 August 2024.

Circumstances: There was no special circumstance during the audit. Opening and closing meeting were held with the factory representatives and worker representatives. All of the findings were discussed in the closing meeting; the factory management signed the onsite CAP and agreed to take corrective actions.

Summary of findings: Findings were noted in PA1, PA5, PA6, PA7 and PA12. For example: PA 1: insufficient CSR management system, insufficient capacity plan. PA5, insufficient social insurance, PA 6: monthly overtime exceeded law requirement. PA 7: insufficient injury insurance, no soap. PA 12, the factory address was not updated for the stationary source emission registration form.

Living wage calculation: #LivingWage

a. No anchor wage available for the producer location, so we used the data provided by auditing company;

- b. The calculation methodology refers to anker living wage structure;
- c. The data comes from the local bureau of statistics for the current year.

Attachment :

1. The Personal Information Protection Law of the People's Republic of China was effective as of 1 November 2021, the producer signed General Terms and Conditions of Business of TUV Rheinland in China before the audit and ensured that relevant personal data and information provided to TUV Rheinland auditor(s) had been obtained the individual's consent during the audit.
2. Agency labour contract was not reviewed as no agency was used. No contractor license/permit was reviewed as no contractor was used during audit period. The auditee had not got any government waiver. No collective bargaining agreements in the auditee, which made the collective bargaining agreements not applicable.
3. According to list of classified management of the construction project environmental impact assessment (2021 edition), the factory only assembly and packing, so the factory didn't need the environmental impact report form and approval. The factory obtained the stationary source emission registration form for period from 10 December 2020 to 9 December 2025.

Remark: The regular working hours arranged for office employees and production employees were 08:00-11:30, 13:30-18:00. However, the auditor arrived at the factory and started the audit at 08:30. The auditor spent 1.5 hour (12:00-13:30) on document review for herself.

## SITE DETAILS

Site	Site amfori ID
<b>Shantou Mingtu Hardware Co., Ltd.</b>	<b>156-044759-001</b>

### GICS Classification

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

### amfori Process Classifications

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N.A.

### GS1 Classifications

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N.A.

### NACE Classification

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Manufacture of domestic appliances

### Water Stress Situation

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This site is not located in a water stressed region

## METRICS

### Key Metrics

Total workforce	23	Workers
Legal minimum wage in local currency	1,850	Monthly
Lowest wage paid for regular work at the site	1,850	Monthly
Calculated living wage in local currency	2,299.88	Monthly
Total sample	6	Workers

### Other Metrics

Male workers	15	Workers
Female workers	8	Workers
Non-binary workers	0	Workers
Permanent workers - Male	15	Workers
Permanent workers - Female	8	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	2	Workers
Management - Female	1	Workers
Management - Non-binary	0	Workers
Apprentices - Male	0	Workers
Apprentices - Female	0	Workers
Apprentices - Non-binary	0	Workers
Workers on probation - Male	0	Workers
Workers on probation - Female	0	Workers
Workers on probation - Non-binary	0	Workers
Workers with night shift - Male	0	Workers
Workers with night shift - Female	0	Workers
Workers with night shift - Non-binary	0	Workers
Workers with disabilities - Male	0	Workers
Workers with disabilities - Female	0	Workers
Workers with disabilities - Non-binary	0	Workers
Domestic migrant workers - Male	1	Workers
Domestic migrant workers - Female	0	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	15	Workers
Workers hired directly - Female	8	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	3	Workers
Sample - Female	3	Workers
Sample - Non-binary	0	Workers

# FINDINGS



## PA1: Social Management System

Site: Shantou Mingtu Hardware Co., Ltd. | Site amfori ID: 156-044759-001

**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
<b>Finding</b>	
<p>The auditee partially respected this principle, because based on management and employee interviews, document reviews, onsite observation, the auditee did not establish the perfect social responsibility management system to implement amfori BSCI Code of Conduct and legal requirements. 1) Based on Social responsibility Management Representative(Mr. Ouyang) interview, the auditee did not establish system on the internal to on-going monitor its social performance and correct the identified findings. 2) Based on documents review, the management system was not perfect in implementation which led to some findings were identified in Fair Remuneration(PA5), Working Hours(PA6), Health and safety(PA7) and Protection of the Environment (PA12) etc., such as the finding of no purchased social insurance for some workers or excessive monthly overtime. It violated amfori BSCI system manual requirement.</p>	<p>被审核方部分遵守该原则，因为基于管理人员和员工访谈，文件评审和现场观察，被审核方未建立完善的社会责任管理体系来执行amfori BSCI的行为守则及法律法规的要求。1) 根据社会责任管理者代表（欧阳先生）访谈，公司没有建立有效的内部监管系统去确保其绩效并改进识别到的问题；2) 根据文件审核，被审核方的管理系统在执行方面不完善导致此次审核在公平报酬（PA5）、工作时间(PA6)、职业健康安全（PA7）和环境保护（PA12）等方面有发现问题，例如未给部分员工购买社保以及月加班时间超时的问题。违反了amfori BSCI系统手册中的要求。</p>

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

ENGLISH	LOCAL LANGUAGE
<b>Finding</b>	
<p>The auditee partially respected this principle, because based on management and employee interviews, document reviews, the company had calculated and analysis the production rate per production unit. Production capacity was made and planned. However, the facility did not discuss the workforce capacity with production management and the worker representatives to reasonably arrange the production capacity, workers' monthly overtime exceeded 36 hours, the maximum was 64 hours from 1 May 2024 to 23 May 2025. It violated amfori BSCI system manual requirement.</p>	<p>被审核方部分遵守该原则，因为基于管理人员和员工访谈，文件评审，公司对生产单位的生产量有进行计算和分析。公司有制定生产规划。但是，公司没有与生产管理人员和员工代表就公司的产能进行讨论以进行合理的生产计划，从2024年5月1日至2025年5月23日，员工月加班超36小时，最多的为64小时。违反了amfori BSCI系统手册中的要求。</p>

## PA 5: Fair Remuneration

Site: Shantou Mingtu Hardware Co., Ltd. | Site amfori ID: 156-044759-001

**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

The auditee did not comply with the principle. Through document review, workers and management interview, the factory provided the social insurance records of the latest one year for review. There were 23 employees in the factory (including 1 retired re-employ employee), there was no employee after declaration of induction of social insurance in May 2025, so the factory would purchase the social insurance for 22 employees in May 2025. According to social insurance records in May 2025, the factory provided the retirement insurance, the illness insurance, work-related injury insurance, unemployment insurance or child-bearing insurance to 15 employees. The facility did not provide 7 employees with retirement insurance, illness insurance, work-related injury insurance, unemployment insurance or child-bearing insurance. The interviewed employees stated that they were covered by the new rural insurance, so they did not want to buy social insurance. The facility did not collect information about the new rural insurance. Reference law: Social Insurance Law of the People's Republic of China; Article 10, Article 23, Article 33, Article 44, Article 53.

被审核方未遵守该原则，通过文件评审，工人和管理层访谈，工厂提供了最近一年的社保记录供审核。工厂有23名员工（包括1名退休返聘员工），没有员工是在2025年5月份社保申报后入职的，所以在2025年5月份工厂应该为22名员工购买社保。根据2025年5月的社会保险记录，工厂给15名员工提供了养老保险，医疗保险，工伤保险，失业保险和生育保险。工厂没有给7名员工提供养老保险，医疗保险，工伤保险，失业保险和生育保险。访谈员工表示他们参加了新农合保险，所以不想买社保。工厂没有收集新农合保险的信息。参考法律：中华人民共和国社会保险法，第10条，23条，33条，44条和53条。

## PA 6: Decent Working Hours

Site: Shantou Mingtu Hardware Co., Ltd. | Site amfori ID: 156-044759-001

**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 management interview, worker interview, document review and site observation, the factory didn't respect this principle. The factory could not systematically control workers' OT hours within the legal monthly OT requirements (Max. 36 hours a month). Details as

依据管理层访谈，工人访谈，文件审核和现场审核，工厂违反该原则。工厂无法系统性控制工人的加班时间符合法定月加班要求（月最大36小时）。详情如下：  
1）根据2024年5月至审核当日的考勤和员工访谈，发现6个随机抽样的员工在2025年4月，2025年3月

Finding	
<p>following:</p> <p>1) Based on the attendance records from May 2024 to audited date and workers interview, it was noted that randomly selected 6 workers' attendance records from April 2025, March 2025 and August 2024 respectively indicated that all workers' monthly OT hours exceeded legal requirements. Maximum monthly OT hours in these 3 months were 56 hours, 62 hours and 64 hours.</p> <p>2) Management interview with factory management showed that they had received orders to control workers' monthly OT, but they didn't take actions to control workers' monthly OT within legal limit; the above was also confirmed by worker interview.</p> <p>3) Reference law: Article 41 of the China Labor Law.</p> <p>Remark: OT hours of May 2025 (Until 23 May 2025) had exceeded legal monthly OT limit; the maximum as 40 hours.</p>	<p>和2024年8月均每月加班超法定要求。月加班每月最大分别56小时, 62小时和64小时。</p> <p>2) 管理层访谈称工厂已收到需要控制月加班的要求, 但没有采取措施来对月加班时间按照法规要求进行控制; 所有这些也得到员工访谈的确认。</p> <p>3) 参考法规: 中华人民共和国劳动法 第四十一条。</p> <p>备注: 工厂2025年5月(直到2025年5月23日)的员工加班超出法定月加班限制, 最大为40小时。</p>

## PA 7: Occupational Health and Safety

Site: Shantou Mingtu Hardware Co., Ltd. | Site amfori ID: 156-044759-001

**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	
<p>The auditee partially complied with the principle. Based document review, workers and management interview, the factory's industrial injury insurance coverage was insufficient. The social insurance receipt of May 2025 showed that 7 out of 23 employees did not purchase the industrial injury insurance, 1 retired re-employ employee did not purchase the special injury insurance and no commercial accident insurance was provided. Manager state that they purchased the commercial accident insurance in April 2025, but they did not provide the evidence of commercial accident insurance. During workers interview, they voluntarily purchased the social insurance. Reference law: Social Insurance Law of the People's Republic of China, article 33</p>	<p>被审核方部分遵守该原则, 通过文件评审, 员工和管理层访谈, 工厂的工伤保险覆盖率不足。2025年5月社保缴费记录显示23名员工中有7名员工未购买工伤保险, 1名退休返聘员工未购买特定工伤险, 也没有购买商业意外保险。管理层解释, 在2025年4月已购买了商业意外保险, 但无法提供商业保险的证据。员工访谈时, 他们自愿购买社保。参考法律法规: 《中华人民共和国社会保险法》第33条</p>

**Question:** 7.22 Is there satisfactory evidence that the auditee provides workers with clean washing facilities, changing rooms and toilets that are also respectful of local customs?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

The auditee partially complied with the principle. Based on-site observation, workers and management interview, the on-site audit found that the soap for hand washing was not provided in the hand washing area of the restroom. Providing soap for hand washing in the toilets would be more convenient for employees. Factory management indicated that improvements would be made as soon as possible. Employee interviews, paper towels were provided but no soap for hand washing was provided. It violated amfori BSCI system manual requirement.

被审核方部分遵守该原则。根据现场观察、工人和管理层访谈，现场审核时发现没有在厕所洗手区提供洗手用的肥皂。在厕所提供洗手用的肥皂对员工来说会更加便利。工厂管理层表示会尽快改善。员工访谈，已提供纸巾，但没有提供洗手用的肥皂。违反了amfori BSCI 系统手册要求。

**PA 12: Protection of the Environment**

Site: Shantou Mingtu Hardware Co., Ltd. | Site amfori ID: 156-044759-001

**Question:** 12.3 Is there satisfactory evidence of the auditee's required environmental permits and licences?

**ENGLISH**

**LOCAL LANGUAGE**

**Finding**

Based on document review, management interviews and on-site observations, the auditee partially respected this principle because: The address of Pollutant Discharged Registration of Fixed Pollution Sources in the facility was not updated. The factory moved its address in February 2023, but the address of the pollutant discharged registration was still the old address. The factory management said that they did not know the account password of the environment platform, but they would find out the password and update it as soon as possible. Reference law: Guidelines for Pollutant Discharge Registration of Fixed Pollution Sources (trial implementation) Article 5

基于文件评审，管理层访谈和现场观察，被审核方部分尊重该原则因为：工厂的固定污染源排污登记的地址没有更新。工厂在2023年2月搬迁了地址，但是排污登记的地址还是旧的地址。工厂管理表示他们不知道环境平台的账户密码，但是他们会尽快找回密码并更新。参考法律：固定污染源排污登记工作指南（试行）第五条